

Moreno, Elizabeth

From: Dante Hamm <dante@greenroadconsulting.com>
Sent: Tuesday, October 22, 2019 2:37 PM
To: Moreno, Elizabeth
Subject: RE: APPS 15619

The water usage for the parcel ending in 80 uses 90,450 gallons. The parcel ending in 79 uses 75,000 gallons. These figures are approximates. The combined 18,250 square feet of mixed light uses approximately 165,000 gallons.

Dante Hamm
Senior Environmental Planner
(707) 630-5041 – Office
1650 Central Avenue, Suite C
McKinleyville, CA 95519

- Civil Engineering
- Environmental Science
- Construction Management
- Rural Land Development



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From: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Sent: Tuesday, October 22, 2019 2:31 PM
To: Dante Hamm <dante@greenroadconsulting.com>
Subject: RE: APPS 15619

Dante, to clarify the water usage for both parcels a total of 18,250 SF of ML is 90,450 gallons ?

From: Dante Hamm <dante@greenroadconsulting.com>
Sent: Tuesday, October 22, 2019 11:02 AM
To: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Subject: RE: APPS 15619

Hi Elizabeth,

I have updated the site map and cults ops to include an additional 10,000 gallons of water storage. Also I have included a note stating that water storage is shared between the two adjoining parcels. Let me know if this an issue.

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From: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Sent: Monday, October 21, 2019 2:27 PM
To: Dante Hamm <dante@greenroadconsulting.com>
Subject: RE: APPS 15619

Whoops.

From: Dante Hamm <dante@greenroadconsulting.com>
Sent: Monday, October 21, 2019 2:22 PM
To: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Subject: RE: APPS 15619

Hi Elizabeth,

I reviewed your project description, it appeared to be accurate to the information submitted. Was the compliance agreement supposed to be attached in your previous email? There was no attachment.

Thanks,

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Moreno, Elizabeth

From: Dante Hamm <dante@greenroadconsulting.com>
Sent: Thursday, October 10, 2019 3:23 PM
To: Moreno, Elizabeth
Subject: RE: APPS 15619 and 15620
Attachments: STO-051-080-COUNTY.pdf; STO-051-079-COUNTY.pdf; 079 CultOps..pdf; 080 CultOps..pdf

Hi Elizabeth,

The Applicant will have their product processed offsite, by a licensed third party processor.

Please see attached.

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From: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Sent: Thursday, October 10, 2019 2:56 PM
To: Dante Hamm <dante@greenroadconsulting.com>
Subject: RE: APPS 15619 and 15620

Dante,

Thank you, for the submittals. I have one more concern, trimming onsite requires a commercial building with a ADA restroom. See the memorandum attached.

Is this something that the applicant would be interested in doing in one building or process off site at a license facility?

Let me know, I am close in wrapping up 15619.

Best,



Elizabeth Moreno

Planner II

Cannabis Services Division

Planning and Building Department

707.445.7245

From: Dante Hamm <dante@greenroadconsulting.com>

Sent: Thursday, October 10, 2019 1:53 PM

To: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>

Subject: RE: APPS 15619 and 15620

Hi Elizabeth,

Please find an updated site plan and updated cults and ops plan for both apps no.

For clarity sake, the applicant will not use their well for cannabis irrigation. The Applicant plans to use a rainwater catchment system for cannabis irrigation. They are planning to get more storage to meet the forbearance period.

Let me know if you have any question or concerns.

Thank you

Dante Hamm

Senior Environmental Planner

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From: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Sent: Tuesday, October 8, 2019 11:41 AM
To: Dante Hamm <dante@greenroadconsulting.com>
Subject: RE: APPS 15619 and 15620

Yes, my apologies.



Elizabeth Moreno
Planner II
Cannabis Services Division
Planning and Building Department
707.445.7245

From: Dante Hamm <dante@greenroadconsulting.com>
Sent: Tuesday, October 08, 2019 11:37 AM
To: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>
Subject: RE: APPS 15619 and 15620

Hi Elizabeth,

Did you mean APN 210-051-079 instead of 210-051-019?

I will look into getting you what you need.

Dante Hamm
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From: Moreno, Elizabeth <EMoreno@co.humboldt.ca.us>

Sent: Tuesday, October 8, 2019 11:13 AM

To: Dante Hamm <dante@greenroadconsulting.com>

Subject: APPS 15619 and 15620

Hi Dante,

I am working on APPS 15619 Sunny Shadows, LLC. I have a few questions.

1. The well log on APN 210-051-019 indicates that it is hydrologically connected. The applicant will have to forbear and will need to have a add a Special Permit for a diversion. Unless a qualified hydrologist indicates otherwise.
2. Please revise the water usage and indicate if there will be enough water for the forbearance period on site for both parcels.
3. Also, on APN: 210-051-080, the concrete tank is encroaching on an Stream SMA. Please indicate if the buffers are from the top of bank or if they are from the edge of the riparian drip line. If the tank is still in the SMA we need to proposed to move it out. This will also require a Special Permit.
4. Please provide the setback of the water tank to the property line.

Best,



Elizabeth Moreno

Planner II

Cannabis Services Division

Planning and Building Department

707.445.7245



**GREEN
ROAD
CONSULTING**

Site Plan Overview and Cultivation and Operations Plan

Applicant/Owner

Sunny Shadows, LLC

Address: 33096 State Highway 36

Bridgeville, CA 95526

APN: 210-051-080

Phone Number: 925-237-6228



Agent

Kaylie Saxon

Green Road Consulting

1650 Central Avenue, Suite C

McKinleyville, CA 95519

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I. Site Plan Overview

1.0 Project Information

Sunny Shadows, LLC ("Applicant") is submitting this application for a Zoning Clearance Certificate for 9,375-square feet of existing, Mixed Light commercial cannabis cultivation on a 20-acre parcel, located near Bridgeville, CA ("Parcel"), Assessor's Parcel Number 210-051-080.

The Applicant sources water from a rainwater catchment system that uses the residence, Generator Room and Multi Use Building as catchment surfaces totaling 3,560 square feet of catchment surface.

There are three (3) buildings on site. The Residence is a 3,000-square foot place of living that was constructed prior to the Applicant's ownership of the parcel, around 1989. The Generator Room is a 16'x10' building that is used for Nutrient and Pesticide houses the 6.5kW backup generator for the residence. It was constructed around 1989. The Multi Use Building is a 20'x20' structure that is used for propagation, drying and pesticide storage. It was constructed in 1989.

The Parcel is primarily served by a 3.8 kW solar array located on site. There is one (1) 6.5kw generator for back up use for the residence. Fuel for the generator is stored in a 500-gallon diesel tank. There are no compost or soil piles on site. Trash and refuse are stored in watertight containers in the garage of the residence.

There are three (3) greenhouses on site totaling to 9,375 ft² of Mixed Light cultivation. The Applicant is anticipating two (2) harvests from the greenhouses, sometime in July and October. The Applicant will be machine processing on site.

This application is submitted through their agent, Kaylie Saxon of Green Road Consulting, Inc., and has been prepared in accordance with Humboldt County's ("County") Commercial Medical Marijuana Land Use Ordinance ("CCLUO").

The Zoning Clearance Certificate would achieve the following results for the Applicant:

- a. Permit 9,375 square feet of Mixed Light commercial cannabis cultivation activities that were in existence prior to January 1, 2016, in compliance with the County CCLUO.
- b. Comply with applicable standards for water quality maintenance and watershed protection through the Waiver of Waste Discharge requirements of the North Coast Regional Water Quality Control Board ("Water Board") and California Department of Fish and Wildlife ("Fish and Wildlife").

2.0 Project Location

The Applicant's Parcel is located in the inland zone of Humboldt County near Bridgeville, CA. The Parcel is comprised of 20-acres and is identified by Assessor's Parcel Number ("APN") 210-051-080. The street address for the Parcel is 33096 State Highway 36 Bridgeville, CA 95526.

2.1 Zoning Classification

The County's Zoning Classification of the Parcel is FR-B-5(20) with a Current General Plan Framework of RA20-160. The CCLUO permits existing commercial cannabis cultivation on

land zoned as FR with open air cultivation sites between 5,000 square feet and 10,000 square feet with a Zoning Clearance Certificate.

2.2 Site Topography

A map of the Parcel's topography is included as Attachment "A."

3.0 Easements

The following information is taken from Exhibit "A" of the Grant Deed, a copy of which is included in Evidence of Ownership and Authorization section of this application.

Exhibit "A"

DESCRIPTION

That real property situate in the County of Humboldt, State of California, described as follows:

PARCEL ONE:

Lot 11 of parcel Map No. 3 (Deerfield Ranch), as per Map recorded in Book 1, Pages 5,6,and 7 of "Parcel Maps" in the Office of the County Recorder of Humboldt County, State of California.

EXCEPTING therefrom that portion thereof conveyed to the State of California, by Deed recorded November 29, 1983 in Book 1719 of Official Records, Page 745, described as follows:

COMMENCING at the Northeast corner of Section 15, Township 1 North, Range 4 East, Humboldt meridian, as said corner is shown on said Parcel Map No. 3;

Thence South 11 degrees 22 minutes 20 seconds East, 4143.95 feet to the a point that bears South 82 degrees 56 minutes 00 seconds West, 157.51 feet from Engineer's Station "O" 482+00.00 P.O.T. o the California Department of Transportation Survey about 8.6 miles East of Bridgeville at 3.1 miles West of Butte Creek Bridge No. 4-116 (State Highway 1-Hum-36-PM 33.3), said point being the true point of beginning;

(1) thence, South 42 degrees 22 minutes 27 seconds East, 104.16 feet to the Westerly line of State Highway 36;

(2) thence, along said Westerly line, North 11 degrees 28 minutes 06 seconds West, 35.10 feet;

(3) thence, continuing along said Westerly line, North 02 degrees 24 minutes 01 seconds West, 150.49 feet to the Northwesternly line of said Lot 11;

(4) thence, continuing along said Westerly line, North 02 degrees 24 minutes 13 seconds West, 116.22 feet to a point that bears North 42 degrees 22 minutes 27 seconds West from the true point of beginning;

(5) thence, South 42 degrees 22 minutes 27 seconds East, 59.95 feet to the true point of beginning.

PARCEL TWO

“Together with a subject to that certain Declaration of Grant and Reservation of Easement executed by the Bank of California, a national association, and recorded on June 16, 1967 in Book 925 of Official Records, Page 171, in the Office of the County Recorder of Humboldt County, State of California.”

4.0 Natural Waterways

There are two (2) Class III drainages that are on the parcel. The cultivation resides more than 50-feet away from the watercourse.

5.0 Location and Area of Existing Cultivation

Mixed Light Cultivation – 9,375ft²

Greenhouse #1

Greenhouse #1 is a 125'x35' greenhouse totaling 4,375 ft² of Mixed Light cultivation.

Greenhouse #2

Greenhouse #2 is a 100'x30' greenhouse totaling 3,000 ft² of Mixed Light cultivation.

Greenhouse #3

Greenhouse #3 is a 100'x20' greenhouse totaling 2,000 ft² of Mixed Light cultivation.

6.0 Setbacks of Cultivation Area

Greenhouse #1

Greenhouse #1 is setback from the closest parcel line by 113 feet. Because this is within 270 feet of an undeveloped parcel, they will be obtaining owner consent.

Greenhouse #2

Greenhouse #2 is setback from the closest parcel line by 47 feet. Because this is within 270 feet of an undeveloped parcel, they will be obtaining owner consent.

Greenhouse #3

Greenhouse #3 is setback from the closest parcel line by at least 47 feet. Because this is within 270 feet of an undeveloped parcel, they will be obtaining owner consent.

7.0 Access Roads

The following details regarding the Access Roads, Stream Crossings and Legacy Waste Discharges are pulled from the Site Management Plan, which was created in accordance with SWRCB Order WQ 2017-0023-DWQ. Map Points referenced are from the Site Management Plan.

Access Roads

The site has 0-miles of permanent roads, approximately 0.75-miles of seasonal access roads, and 0-miles of skid roads. The seasonal roads are native surface with sections of roads that are in-sloped with a ditch relief culvert or out-sloped. The seasonal access roads are drained via rolling

dips, ditch relief culverts, and out-sloping. The seasonal access roads on the site were not fully stable according to the Pacific Watershed Associates (PWA) "Handbook for Forest, Ranch, and Rural Roads". There were two locations where the road drainage did not meet the standard. Rolling dips will be installed at **MP2** and just east of **MP6** as shown on the Overview Map. The access road also had a failing 5-inch ditch relief culvert that will be replaced with an 18-inch pipe (**MP3**). For location of disturbed areas requiring stabilization see the Disturbed Area Map.

Short sections of the access roads on the site had slopes that approached 17%. These sections will be armored with crushed angular rock. The access roads on the site are maintained when needed. The roads are only used during cultivation season by the land owner, May through October. The main access road at the site is shared with a neighboring parcel. The roads are used minimally by workers navigating the site and bringing in supplies. Workers are on the site daily and most supplies are brought in the beginning of the season. Vehicles are primarily parked near either residence on each parcel. Stabilization of existing roads will be addressed in the Site Erosion and Sediment Control Plan.

Stream Crossings

There is one (1) stream crossing on the property that is the responsibility of the property owner (**MP1**). The stream crossing consisted of a 24-inch corrugated plastic pipe (CPP) on a class III stream, which received flow from two in-board ditches. The ditches will be rock lined for approximately 25-ft from the watercourses on either side. The culvert is not sized for the 100-yr storm event and will be replaced with a minimum 30-inch culvert. All stream crossing work will be permitted through the appropriate agencies (e.g CDFW, NCRWQCB) before work commences.

Table 1: Overview of stream crossings on the property.

Label	Size (inch)	Type	Watercourse Class	Condition
STX1	24	CPP	Class III	Ok, but undersized for 100-yr storm

Legacy Waste Discharge

The site was historically logged with main logging roads, skid roads, and log landings on the property. The site utilized the existing infrastructure from logging practices which required minimal grading and brush clearing. Skid roads on the site were in stable condition with no major erosion or sediment delivery to any watercourse.

8.0 Graded Flats

The graded flats have a grading permit application pending. A copy of the grading plan is included.

9.0 Existing Buildings

Domestic Buildings

Residence

The Residence is a 3,000 ft² residence that was constructed prior to the Applicant taking ownership of the parcel. It was constructed in approximately 1989.

Generator Room

The Generator Room is a 16'x10' building that houses the back-up domestic generator (6.5kW). It was constructed sometime in 1989.

Cultivation Related Buildings

Multi-Use Building

Multi-Use Building is a 20'x20' building where immature cannabis plants are propagated and harvested cannabis is dried and processed. The building was constructed in 1989.

10.0 Water Source, Storage, Irrigation Plan and Projected Water Use

10.1 Water Source

Water used for cannabis irrigation is sourced from the rainwater catchment system that captures water from the roof of the residence, multi-use building and the generator shed totaling 3,560 ft² of catchment surface that pipes to the existing 100,000-gallon cement water tank. The following formula was used to calculate the amount of rainfall the Applicant is capable of capturing off the residence.

Formula Used: *Catchment Area (ft²) x Rainfall Depth (in.) x 0.623 (conversion factor) = Harvest Water (gal)*

The Average Annual Rainfall Depth for Humboldt County, CA, is 42 in (noaa.gov).

$$3,560 \text{ ft}^2 \times 42 \text{ in.} \times 0.623 = 93,150 \text{ gal}$$

Once cultivation activities commence, the greenhouses can also be hooked into the catchment system and utilized to capture more rainwater. If necessary, the Applicant can also utilize the ground water well on APN: 210-051-079.

10.2 Water Storage

The Applicant has a total of 159,000-gallons of water storage.

- Six (6) 2,500-gallon HDPE tanks.
- Two (2) 1,000-gallon HDPE tanks
- One (1) 2,000-gallon HDPE tank
- One (1) 100,000-gallon concrete tank
- Eight (8) 5,000-gallon-HDPE tanks (proposed)

10.3 Irrigation Plan

The Applicant hand waters cannabis plants at an agronomic rate. An Irrigation Assessment including a water budget that outlines projected monthly irrigation demands broken out by each discrete cultivation site and the monthly water demands. The Water Use Assessment is included as Attachment, "B."

10.4 Projected Water Use

The amount of water used for the cultivation of cannabis will vary throughout the year, with peak periods of water use occurring during the summer months. The Applicant's cultivation and water use is outlined in the Irrigation and Cultivation Activities Chart, attached as Attachment "B."

10.5 On-Site Water Conservation Measures

All irrigation infrastructure will be regularly inspected for leaks and immediately repaired if any are found. Weed free mulch or straw will be used in cultivation areas that do not have ground cover to reduce evaporation and conserve water. Water conservation such as water timing and drip irrigation will be implemented to ensure water is applied at agronomic rates. The cultivator will record daily irrigation water usage and maintain records on site for a minimum of 5 years.

10.6 Water Use Record Keeping Practices

Per Sections 55.4.12.7.5 through 55.4.12.7.7, the applicant will adhere to the following metering and record keeping practices.

- A metering device shall be installed and maintained on all discrete points of diversion or other locations of water withdrawal (in this case, the Applicant's well). The meter shall be located at or near the point of diversion or withdrawal.
- A metering device shall be installed and maintained at or near the outlet of all water storage facilities utilized for Irrigation.
- Operators shall maintain a weekly record of water collected from Diversionary sources, as well as a record of all water used in Irrigation of permitted Cultivation Areas. A copy of these records shall be stored and maintained at the cultivation site and kept separately of differentiated from any record of water use for domestic, fire protection, or separately or differentiated from any record of water use for domestic, fire protection, or other irrigation purposes. Irrigation records shall be reported to the County on an annual basis, at least thirty (30) days prior to the date of each annual permit inspection. Records shall also be made available for review during site inspections by local and state officials.

11.0 Site Drainage, Runoff, Erosion Control Measures and Watershed Protection

***Please note, the Site Management plan covers two parcels, APN: 210-051-079 and 210-051-080. Because of this, water usage tables and remediation measures will not be reflective of this parcel specifically.**

The following is taken from the Applicant's Site Management Plan which was created in accordance with the SWRCB Order WQ 2017-0023-DWQ. While the Applicant is not currently cultivating, once they begin, they will be enrolled as a Tier 1, Moderate Risk site. Deadlines referenced are fluid and are dependent on jurisdictional authorization. Map points referenced are from the Site Management Plan.

Erosion Prevention and Sediment Capture

The disturbed areas consisted of the cultivation areas, soils/amendment piles, unstable road segments, and a processing area as shown on the Disturbed Area Map. For details on erosion prevention and sediment capture, see the Site Erosion and Sediment Control Plan.

Water Uses

Water for cannabis irrigation and domestic is sourced from a groundwater well. All irrigation infrastructure will be regularly inspected for leaks and immediately repaired if any are found. Weed free mulch or straw will be used in cultivation areas that do not have ground cover to reduce evaporation and conserve water. Water conservation such as water timing and drip irrigation will be implemented to ensure water is applied at agronomic rates. The cultivator will record daily irrigation water usage and maintain records on site for a minimum of 5 years. Since the site sources water from a confined aquifer there are no forbearance restrictions. The estimated annual water use is summarized below.

Table 2: Annual estimated water uses on the parcel for cannabis cultivation.

Source	Use	Start Date	End Date	To Storage (gallons)	To Use (gallons)
Rain Catchment	Cannabis	Apr. 1	Nov. 1	224,000	
Well	Cannabis	Apr. 1	Nov. 1		160,000
Rain-Catchment Storage	Cannabis	Apr. 1	Nov. 1		224,000

The site has 224,000-gallons of water storage available which is summarized in Table 3. Water meters will be installed to monitor use. To conserve water, a straw or mulch ground cover should be applied to reduce water evaporation. Water conservation methods such as watering method and timing will be employed to ensure water is applied at agronomic rates.

Table 3: Summary of water storage on the parcel.

Water Storage Type	Size (gallons)	Number	Total (gallons)
Hard Tank	2,500	6	15,000
Hard Tank	5,000	1	5,000
Hard Tank	2,000	1	2,000
Hard Tank	1,000	2	2,000
Concrete Tank	100,000	1	100,000
Bladder	50,000	2	100,000
Total			224,000

The water bladders did not have proper containment and were not permitted (MP4 & MP5). The

water bladder will require a berm 1.5 times higher than the water bladder when full. The water bladders will be removed from the site within the next two years and will likely be replaced with more water storage if necessary. The water bladders will be disposed of at an appropriate waste facility.

Fertilizers, Pesticides and Herbicides - Application, Storage and Disposal

All fertilizers, Pesticides, Herbicides and Rodenticides will be mixed or prepared in locations where they cannot enter a waterbody (surface or groundwater). Fertilizers, Pesticides, Herbicides and Rodenticides shall be applied at agronomic rates specified on the product label. The enrollee will keep a log of their fertilizers, pesticides and herbicides use for annual reporting. All labels will be kept, and directions followed when amendments and fertilizers are applied. All liquid chemicals will be stored in *separate* secondary containment. During the off season all chemicals will be stored in a locked building. Agricultural chemicals will not be applied within 48-hr of a predicted rain event with a 50% or greater chance of 0.25-inches. Disposal of unused products will be consistent with labels on containers. Empty containers will be disposed of at an authorized recycling center. A spill clean-up kit will be stored in the garage/shop. No restricted materials or pesticides will be used or stored on site. No greater than 319 pounds of nitrogen per acre per year shall be applied. A summary of fertilizers, pesticides, and herbicides used annually are listed below.

Table 2: Overview of annual chemical/fertilizer use.

Product Name	Chemical/Fertilizer Type	N-P-K or Active Ingredient	Annual Use (lbs. or gallons)
North Coast Plant Therapy	Insecticide	Soybean Oil, Peppermint Oil, Citric Acid	1.25 gallons of concentrate
Pure Neem Oil	Pesticide	Azadirachtin	.25 gallons
Ed Rosenthal's Zero Tolerance	Fungicide	Potassium Bicarbonate, Cinnamon, Thyme	10 gallons
MAXSEA Plant Food	Fertilizer	16-16-16	15 gallons
Cal-Mag	Fertilizer	2-0-0	15 gallons
Dyna-Gro Bloom	Fertilizer	3-12-6	15 gallons
Dyna-Gro Bloom	Fertilizer	7-9-5	15 gallons
Chicken Manure	Fertilizer	1.1-0.8-0.5	500 lbs
Fish Powder	Fertilizer	12-1-1	50 lbs

Spill Prevention and Clean Up

A spill cleanup kit will be in the storage buildings near each residence. In case of a major spill of

fertilizers, or any petroleum products, the cannabis cultivator shall immediately notify the California Office of Emergency Services at 1-800-852-7550 and initiate cleanup activities for all spills before they enter a waterbody or degrade groundwater.

Petroleum - Use, Storage, and Disposal

The site is not grid tied and uses generators that require storage of petroleum products. Generators are only used as a backup system and are not the primary power source. A large fuel containment system had the appropriately sized containment but did not have a cover (MP7). The fuel container will get a cover and will be permitted with the Department of Environmental Health. The site also had two (2) locations where used oil was inappropriately stored on the bare soil (MP6 & MP5). Trash and used oil will be stored in sheds temporarily before being removed to the appropriate waste facility. While in use, the generators will need to be stored with drip containment outside of riparian setbacks. Fueling of the generators, as well as any other equipment or vehicles, will also take place outside of the riparian setbacks. All equipment containing petroleum derivatives will be inspected regularly for leaks. When the generators are not in use they will be stored in a covered building.

Table 3: Overview annual petroleum usage.

Product	Chemical Type	Annual Use (lbs. or gallons)
Gasoline	Petroleum	150 gallons
Motor Oil	Petroleum	45 gallons

Cultivation Waste, Trash/Refuse and Domestic Wastewater

Trash/Refuse Overview

All trash will be stored in a shed near each residence. Trash will be removed on a weekly basis to an authorized landfill. No trash or debris will be allowed to enter a watercourse or riparian setback area. Compostable cultivation waste will be stored in a location and manner where it cannot be transported to surface waters. The site had multiple cultivation soil piles that will require a perimeter control and cover when not in use. Spent growth medium (e.g. soil) shall either be reused, disposed of at an appropriate waste site, or be spread outside of riparian setbacks and planted with native vegetation.

Domestic Wastewater BPTC Measures

It is unknown if the site has a permitted septic system. The site was historically using pit toilets for human waste disposal. Pit toilets will be filled in immediately. Portable toilets will be brought onto the site until a permitted septic system can be obtained. Portable toilets will be serviced regularly and located outside of riparian setbacks and away from unstable areas.

Winterization Measures - Summary

It is required that winterization measures be completed annually before the onset of the winter rainy season. The SWRCB has defined the winter season as beginning November 1st and concluding April 1st. Winterization measures apply to cultivation areas, any additional disturbed areas including roads, and stream crossings. These measures aim to prepare the site for an extended period of heavy precipitation during which frequent access, monitoring, and maintenance can be challenging or infeasible. The end goal is to reduce the erosion of unstable areas and prevent the delivery of eroded sediment to sensitive waterways.

One of the primary techniques of winterization consists of stabilizing all bare soils with straw and seed. Fiber rolls shall additionally be installed at grade breaks and along slopes of disturbed areas to break up flow paths, thereby reducing the speed and erosive energy of runoff. No heavy machinery shall be used during the winter season to avoid the degradation of saturated roadways and unstable surfaces. Soil stock piles shall be guarded before the onset of winter with a cover and/or perimeter controls such as fiber rolls. Culverts shall be inspected and maintained to ensure integrity during winter. This includes clearing inlets and outlets of sediment and/or debris and ensuring that sufficient energy dissipation exists at outlets to reduce bank erosion. Seasonal access roads shall be locked to ensure that roads are not in use during the wet season by trespassers.

Aside from the erosion control components to winterization, a general and thorough site cleanup will be performed to remove all refuse from the site. Additionally, all fertilizers and petroleum products to be left on site will be stored in secondary containment and locked in the shipping container to avoid spillage and discharge to surface or groundwater.

Monitoring

Monitoring is broken up into 3 reports; Facility Status, Site Maintenance, and Storm Water Runoff Monitoring. For Low Risk sites the only monitoring report required is the Facility Status Report. For Moderate and High-Risk sites all three monitoring reports need to be completed. See "Site Erosion and Sediment Control Plan" for details on the Site Maintenance and Storm Water Runoff Monitoring.

Annual reports for the cultivation site will be submitted to the North Coast Regional Water Quality and Control Board (NCRWQCB) prior to March 1 of the following year. The annual report shall include the following:

Facility Status, Site Maintenance, and Storm Water Runoff Monitoring
Name and contact information for the person responsible for operation, maintenance, and monitoring.

Reporting documents can be emailed to northcoast@waterboards.ca.gov or mailed to 5550 Skylane Blvd., Ste. A, Santa Rosa, CA 95403.

Table 4: Facility status monitoring requirements.

<u>Monitoring Requirement</u>	<u>Description</u>
Winterization Measures Implemented	Report winterization procedures implemented, any outstanding measures, and the schedule for completion.
Tier Status Confirmation	Report any change in tier status. (Stabilization of disturbed areas may change the tier status of a facility. Contact the Regional Water Board if a change in status is appropriate.)
Third Party Identification	Report any change in third party status as appropriate.
Nitrogen Application	Report monthly and annual total nitrogen use for bulk, solid, and liquid forms of nitrogen. Provide the data as lbs./canopy acre/time (month or year) as described in Nitrogen Management Plan.

12.0 Biological Assessment

A full biological assessment was completed for the parcel by two qualified biologists, one who focused on a Wildlife Resource Report and one who focused on a Botanical Resource Assessment.

The Wildlife Resource Report came to the conclusion that the proposed action of cannabis cultivation will have no effect on any special status species, either because the project is outside of their known range, suitable habitat is lacking or the proposed project will not result in adverse impacts to the species or their suitable habitat. Project activities are not expected to produce adverse cumulative effects to sensitive wildlife species due to the small size of the project and lack of significant habitat alteration.

The Botanical Resource Assessment found that while the parcel may several special status plant species habitats, the project proposes no additional disturbance to natural vegetation, and should not have adverse impacts to special status plants assuming they are present on the property. The project is not expected to have indirect impacts such as significant shading or alteration of hydrology.

13.0 Stormwater Management Plan

The Applicant's Compliance Agreement required a Remediation Plan, which was designed specifically to address erosion issues from stormwater and is included with the application. The Applicant has followed through with remediation measures, and along with their rainwater catchment system, anticipate little issues of erosion from stormwater.

14.0 Energy Use

The majority of the power is sourced from the onsite solar array. The residence also contains a back up generator for domestic power needs.

15.0 Compliance Agreement Summary Status

The Applicant has an executed compliance agreement and has completed all documentation necessary. The grading plan that has been submitted to the building department is pending approval. All fees/fines have been paid.

16.0 Distances from Significant Landmarks

There are no schools, school bus stops, places of worship, or state parks within 600 feet of the cultivation site. There are also no Tribal Lands, areas of Traditional Tribal Cultural Affiliation within 1,000 feet of the cultivation site. The Applicant has completed a report with a licensed archaeologist.

II. Cultivation and Operations Plan

1.0 Materials Storage

All fertilizers and amendments are located in the Multi-Use Building on the Parcel. Fertilizers and amendments are placed on the shelves and floor where any spill will be contained. All labels are kept and directions are followed when nutrients are applied. The storage area is in need of posted instructions for storing fertilizers and amendments, instructions for cleaning up spills and a spill kit that contains a container, gloves, towels, absorbent socks and an absorbent material (kitty litter).

Currently, there are no pesticides or herbicides registered specifically for use directly on cannabis. The Applicant will be using items that were accepted under Legal Pest Management Practices for Marijuana Growers in California.

The Applicants Materials Management Plan is included with the Application further detailing their waste management practices.

1.1 On-Site Waste Treatment System Information

The Applicant has an unpermitted septic system on-site. They are contracted to have this system evaluated and permitted through the Humboldt County Department of Environmental Health.

They system currently only is used for domestic purposes, should employees be on site, the Applicant will first have portable toilets and handwashing stations delivered for use.

2.0 Cultivation Activities

The Applicants Cultivation Chart is included as Attachment "B."

Mixed Light Cultivation

- Structures used for Mixed Light Cultivation and Nurseries shall be shielded so that no light escapes between sunset and sunrise. The Applicant will ensure this by covering the greenhouses with blackout plastic during the hours between sunset and sunrise while artificial lighting is in use.
- The lighting will comply with the International Dark Sky Association standards for Lighting Zone 0 and Lighting Zone 1 and be designed to regulate light spillage onto neighboring properties resulting from backlight, up light or glare (BUG).

- Should the Humboldt County Planning Division receive complaints that the lighting is out of alignment or not complying with these standards, the Applicant will provide written verification that the lights' shielding, and alignment has been repaired, inspected and corrected as necessary.

Cultivation Standards

The Applicant will adhere to and uphold the following cultivation standards:

- Maintain compliance with all applicable state laws and County ordinances
- Maintain valid licenses issued by the appropriate state/local licensing authority or authorities for the type of activity being conducted, as soon as such licenses become available.
- Where subject to state licensures, participate in local and state programs for "Track and Trace" once available.
- Maintain a current, valid business license at all times.
- Consent to an annual on-site compliance inspection, with at least 24 hours prior notice, to be conducted by appropriate County officials during regular business hours (Monday – Friday, 9:00 am – 5:00 pm, excluding holidays).
- Pay all applicable application and annual inspection fees.
- Comply with any special conditions applicable to the permit or Premises which may be imposed.

3.0 Processing Practices

Plants will be harvested one at a time using hand shears and taken into Multi-Use Building #1 and #2 where it will be dried and cured. Harvested cannabis will either be processed by machine trimming at these locations or by hiring a licensed, 3rd party processor.

All work surfaces and equipment are maintained in a clean, sanitary condition. Protocols to prevent the spread of mold are strictly followed. The final cannabis product is stored in a secure location.

The Applicant will be utilizing any Track and Trace program the County seeks to implement, abiding by all appropriate record keeping practices.

While the Applicant is currently not anticipating the use of any employees (two fulltime individuals run the site annually), the following standards will be upheld if employees are hired.

- Applicant 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.)
- Cultivation operations and processing operations must implement safety protocols and provide all employees with adequate safety training relevant to their specific job functions which may include:
 - Emergency action response planning as necessary;

- Employee accident reporting and investigation policies;
- Fire prevention;
- Hazard communication policies, including maintenance of material safety data sheets (MSDS);
- Materials handling policies;
- Job hazard analyses; and
- Personal protective equipment policies, including respiratory protection.
- Applicant will visibly post and maintain an emergency contact list which includes at a minimum:
 - Operation manager contacts;
 - Emergency responder contacts;
 - Poison control contacts.
- 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.
- On site-housing provided to employees shall comply with all applicable federal, state, and local laws and regulations.

Should the Applicant follow through with machine trimming harvested cannabis onsite, the following standards will be upheld.

- Processing operations must be maintained in a clean and sanitary condition including all work surfaces and equipment.
- Processing operations must implement protocols which prevent processing contamination and mold and mildew growth on cannabis
- Employees handling cannabis in processing operations must have access to facemasks and gloves in good operable condition as applicable to their job function.
- Employees must wash hands sufficiently when handling cannabis or use gloves.

Parking and Public Accommodations

The Applicant does not intend to have their facility open to the public. There is enough space for 6 vehicles to park at any given time. Should employees be added, an additional 2 spaces per employee and compliance with the Americans with Disabilities Act will be maintained

4.0 Security Measures

The access road to the parcel is gated and locked. The Applicant lives on site and is present at all times.



GREEN
ROAD
CONSULTING

Attachment "B"

IRRIGATION AND CULTIVATION ACTIVITIES SCHEDULE

Sunny Shadows, LLC

APN: 210-051-079

[illegible]