WILMA RANCH, LLC OPERATIONS PLAN 701 MILLER RANCH ROAD HUMBOLDT COUNTY, CA

EXISTING MEDICAL CANNABIS CULTIVATION FACILITIES

PREPARED FOR:



December 2019





Cultivation and Operations Plan

For

Wilma Ranch, LLC

701 Miller Ranch Road Redway, CA 95560

> APN 216-022-013 APN 216-022-014

County	APP#	
WDID#		

Existing Medical Cannabis Cultivation Facilities Lead Agency: Humboldt County Planning Department

3015 H Street Eureka, CA 95501

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ATTACHMENTS

Appendix A: Personnel Acknowledgement Form

Appendix B: Site Plan, Floor Plans and Elevations

Appendix C: Pesticide Storage, Handling and Application Plan Appendix D: Emergency Procedures and Contact Information

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1. PROJECT SUMMARY

1.1. PROJECT NARRATIVE

Wilma Ranch, LLC (WRL) is applying for a special permit for 10,000 square feet (sf) of existing outdoor medical cannabis cultivation located on Assessor Parcel Number (APN's) 216-022-013, 216-022-014, a total of 80 acres near the community of Harris. The cultivation facilities are within the County of Humboldt's (County) Residential Agriculture (RA40) zone and has existing infrastructure including water storage, and drying facilities. The two APN's have yet to be deemed one legal parcel per County of Humboldt Planning and Building. No cannabis activities will occur on parcel 216-022-014.

The Applicant will be sourcing their cultivation water from one (1) existing well (1991) that is pending WCR. The Applicant is estimating to use approximately 80,000 gallons of water annually.

The power source is GRID.

On APN 216-022-013, existing improvements NOT associated with cannabis consist of a private residence (Hanson) (65'x65') built in 1978 with an existing septic installed in 1990, a barn (20'x30') built in 1980, shed (12'x50'), a private residence (24'x24') built in 1980 with an existing septic installed in 2006, a shed (20'x24') built in 2006, a 24' diameter Yurt built in 2008 and a (16'x20') accessory structure built in 2012 with an existing septic installed 2016. Existing improvements that are associated with cannabis consist an existing shed (12'x16') built in 1990, a proposed metal building (16'x30') in 2020 and proposed metal container (8'x20') in 2020. Proposed metal building are to be used for drying and curing, the metal container is to be used for secure storage. The existing storage shed is used for storage of nutrients, fertilizer and pesticides.

On APN 216-022-013, existing cultivation is located in a single fenced area totaling 10,000 sf. All cultivation activity would fall within an area zoned RA40 (Residential Agriculture) and meet the required setbacks upon classification of surrounding streams and drainages. Per the Humboldt County Zoning Regulations, areas zoned RA40 where agriculture is allowable. The cultivation is setback from the northern parcel line by approximately 1,300 feet and the western line by at least 200 feet. The cultivation is setback from the nearest water course by over 350 feet. The cultivation area is located on slopes less than 15% on the top of the ridge.

The Applicant will plant in June and will have one (1) harvest in October. The Applicant will be selling unprocessed bucked down bulk trim and flower, use a third party processing service. Resident family farmers operate the farm. Currently, no employees are a part of any cannabis activity.

Permits for the proposed medical cannabis cultivation activity will be obtained from all jurisdictional government entities.

1.2. STATE AND LOCAL COMPLIANCE

1.2.1, STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

WRL will obtain a Commercial Cannabis Cultivation license from the State of California.

1.2.2. STATE WATER RESOURCES CONTROL BOARD

The primary agricultural water source on the property is from an existing well installed in 1991. Due to the fact that the original well application in 1991 was never completed by well driller, the applicant's Well Completion Report is pending. Applicant has filed for a repair permit with DEH and is currently working with Fisch Drilling.

WRL has submitted an application for enrollment with the State Water Resources Control Board (SWRCB) for coverage under Tier 1 of Order WQ 2017-0023-DWQ General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation and Activities.

Applicant applied for enrollment on 12-14-19, application # 422978 and is awaiting a WDID: _____. There was no need to apply for a SUIR. See Notice of Receipt for Cannabis SIUR and General Order in attachments.

1.2.3. HUMBOLDT COUNTY BUILDING DEPARTMENT

Building permits will be obtained from the Humboldt County Building Department for all existing structures, proposed structures and supporting infrastructure (including septic systems) and grading activity upon approval of the use permit.

1.2.4. CAL FIRE

Developed areas are located outside of areas zoned for Timber Production (TPZ).

1.2.5. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

A Lake and Streambed Alteration Agreement (LSAA) was not required to be obtained from the Department of Fish and Wildlife (DFW) as part of this process. This cannabis cultivation project will not substantially modify any river, stream, or lake. Applicant completed the online self-certification on (DATE) and is awaiting written verification from CDFW.

1.3. AUTHORIZATION FOR COUNTY OF HUMBOLDT STAFF

Per the County of Humboldt's *Commercial Cannabis Land Use Ordinance No.*2599 (CCLUO) §314-55.4 the *Wilma Ranch, LLC Operations Manual* contains the required information for operating medical marijuana cultivation facilities within the limits of the County of Humboldt. The operations detailed in the manual follow the operating standards described in CCLUO §§314-55.4.10 and 314-55.4.11.

Wilma Ranch, LLC is committed to maintaining all necessary permits. Staff at the WRL is required to adhere to the Wilma Ranch, LLC Cultivation and Operations Manual to ensure compliance with state and local regulations (see Attachment A – Personnel Acknowledgement Form). Through this application, the applicant authorizes the County of Humboldt, its agents and employees, to seek verification of the information contained with this application, including verification of the operations as described in the Wilma Ranch, LLC Cultivation and Operations Manual.

Wilma Ranch, LLC consents for onsite inspection of the parcel by County officials at a prearranged date and time in consultation with the applicant prior to issuance of any permit and once annually thereafter. WRL acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation in the event that environmental conditions, such as sustained drought or low flows in the watershed, will not support diversions for irrigation. WRL also acknowledges that the County reserves the right to engage with local Tribes before consenting to issuance of any permit.

2. OPERATIONS PLAN

2.1. WATER SUPPLY AND WATER USE

The existing water source for cannabis irrigation is a well.

Tank storage includes 2, 2,500 gal and 3, 5,000 gallon poly tanks. A total of 20,00 gallons of storage is located on the parcel to be used for domestic use and fire protection.

Estimated Annual Irrigation Water Usage (Gallons) Per 10,000 SF of Cultivation

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
-	-	-	-	5,000	10,000	12,000	15,000	15,000	15,000	8,000	-

The table above outlines the estimated irrigation water usage for WRL during a typical year. Irrigation water usage will be dependent on weather conditions. A water meter will be installed to meter cannabis irrigation and reported as per State Water Board.

2.2. STORM WATER MANAGEMENT PLAN

Refer to the Site Management Plan for descriptions of the site drainage and runoff and erosion control measures.

2.3. INVASIVE SPECIES CONTROL PLAN

Refer to Invasive Species Control Plan - see attachment from biologist.

2.4. WATERSHED AND HABITAT PROTECTION

Refer to the Site Management Plan for descriptions of watershed protection measures.

2.5. MATERIALS MANAGEMENT PLAN

2.5.1. SOLID WASTE MANAGEMENT

Covered waste and recycling bins will be located adjacent to the garden, and proposed metal building.

Waste is removed from the property every other week and is transported to Redway transfer station.

2.5.2. SOILS MANAGEMENT

WRL uses organic farming perma-culture practices that build the soil every year, thus not having stockpiles of spent soil. In the case of soil disposal any spent soil will be stockpiled in a depressed stockpile area to prevent erosion and will be leached and re-used the following season. See 2.7 Cultivation Plan for more information regarding soils and fertilizers.

2.5.3. WASTEWATER MANAGEMENT

On-site wastewater (sewage) treatment will be achieved with an existing septic system for the existing residence. Permitting will be required with Planning & building.

The septic system for the property was designed to accommodate a three bedroom home. Restroom access will be available for all at the existing residence which is located 50 feet from the proposed cultivation area.

2.5.4. USE AND STORAGE OF REGULATED PRODUCTS

The State of California Agricultural Department as well as the Humboldt County Agricultural Department recognizes the need for use of pesticides and fungicides. WRL will employ best management practices when storing, handling, mixing, application and disposal of all pesticides/fungicides. WRL will also engage in the use of pesticides and fungicides that have been approved by state or county agricultural departments, ordinances and initiatives.

WRL will follow required regulations in the storing, handling, mixing, application and disposal of any and all pesticides. The Agent In Charge will hold a State of California Agricultural Department Private Pesticide Applicators License issued through the Humboldt County Agricultural Department. Training of employees in the storing, handling, mixing, application, disposal and emergency spill

containment and clean up procedure will be sole responsibility of the Agent in Charge as the holder of the Private Pesticide Applicators License.

All nutrients, pesticides and fungicides will be stored in accordance with manufactures instructions. In addition, at any place where pesticide/fungicide are to be stored, handled, mixed, applied or disposed, WRL will provide saline eye wash stations, emergency containment, and clean up kits as prescribed in the State of California Agricultural Department Pesticide Applicators License handbook (see Appendix D - Pesticide Storage, Handling and Application Plan and Water Resources Protection Plan for detailed descriptions of practices).

Nutrients used change from year to year. All fertilizers and pesticides applied will be noted and reported as required to the Water Board and the County Ag Department. Example of Nutrients used in past include 60 lbs of chicken compost, 45 lbs of earthworm, castings, 25 lbs of bat guano, 50 lbs of bone meal, 50 lbs of glacial rock dust, 50 lbs of green sand, 50 lbs of kelp meal, and 45 lbs of liquid organic fertilizer and are applied in spring.

Gasoline fuel for rotor-tillers and weed-whackers will be stored in approved tanks with secondary containment. A total of 10 gallons of gasoline fuel will be stored in two (2), 5-gallon gas cans with spill proof dispenser, stored in leak proof plastic totes in the garage. Machine maintenance will be performed on site may include motor oil and 2-stroke mix oil. These products are purchased and used when needed, not stored in bulk on site.

Propane fuel is stored in a 250 gallon tank which will be properly anchored and secured. Residential propane is used for cooking and heat. Portable propane heaters use 5 gallon tanks and may be used in dry shed.

Simple Green and rubbing alcohol (approximately 1-2 gallon of each) are stored within the storage shed

A copy of the Operations Plan as well as a Health & Safety Binder will be kept on site by the Agent in Charge and will contain all material safety data sheets for all regulated products used on site (MSDS).

2.1. HAZARDOUS WASTE STATEMENT AND SITE ASSESSMENT

See Site Management Plan. Wilma Ranch LLC does NOT store any regulated products or any individual chemical (nutrients, pesticides, petroleum products) on-site in excess of 200 lbs or 55 gallons and if so will be disclosed and register as an EPA site. See DEH form and attached MSDS sheets.

2.2. EMPLOYMENT PLAN

2.2.1. RESIDENT FARM MANAGERS

Wilma Ranch, LLC is a family run operation. Applicant and resident family members act as the following Lead Cultivator and Agent in Charge. No employees are currently used, however acknowledges employees may be necessary in the future and will comply as necessary at that time.

2.2.2. ALATORRE-ZENOVICH-DUNLAP-BERMAN AGRICULTURAL LABOR RELATIONS ACT STATEMENT

Wilma Ranch, LLC is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 (commencing with Section 1140) of Division 2 of the Labor Code), to the extent not prohibited by law.

2.2.3. CALIFORNIA AGRICULTURAL EMPLOYER COMPLIANCE

WRL and management will comply with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.2.4. JOB DESCRIPTIONS AND SUMMARY

- Agent in Charge/Compliance: Oversight and management of the entire facility. Responsibilities will include but not be limited to: personnel, records keeping, budget, and liaison with State and County inspectors as needed.
- ➤ Lead Cultivator/Processing Manager: Oversight and management of the day to day cultivation of medical cannabis. This will include but not be limited to: irrigation, fertilization, pesticide management and harvest, oversight and management of the processing the dried/cured medical cannabis.
- > Seasonal Labor: This position is temporary and will vary based on the needs of the farm during the cultivation, harvest and processing seasons.

The Agent in Charge is a principal for the Wilma Ranch, LLC. In addition to the Agent in Charge and Lead Cultivator, WRL intends to use additional seasonal labor as needed. A peak of 4 people during the harvest and processing seasons are expected.

All WRL employees will be required to wear an WRL -issued photo ID badge at all times while working at the cultivation site. They will be required to read the WRL Operating Manual along with Health & Safety Binder. They will also be required to sign and date a form acknowledging they have read and understand its contents (see Attachment A – Personnel Acknowledgement Form).

The Agent in Charge will meet with the Lead Cultivator daily to discuss any pending internal issues relating to day to day operations as well as discuss any upcoming schedule needs. Each department will give a daily synopsis related to their tasks. This will include a daily plant count inventory, a daily fertilizer application summary, a daily pesticide application summary a daily water use summary and a daily inventory of processing and packaging as well as product packaged for distribution. The Lead Cultivator will maintain daily contact with the Agent in Charge to keep the Agent in Charge abreast of any issues that occur pertaining to cultivation, inventory, non-security related employee issues and facility compliance needs. It is the intention of the Agent in Charge to maintain a transparent communication at all times to ensure the uninterrupted flow of medical cannabis remains compliant and within the code of conduct.

2.2.5. WORKER SAFETY PRACTICES

All family members will be trained on proper safety procedure. This training will include but not be limited to: fire safety, proper harvesting techniques, use of harvesting equipment, use of rubber gloves and respirators, use and cleaning of trimming machines per manufactures direction, proper hand washing guidelines and an Emergency Procedures Plan in case of emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted in a conspicuous place. WRL will provide rubber gloves and respirators or dust masks to all employees. WRL will provide Saline Eye Wash Stations at strategic places inside the Processing Facility. WRL will also provide each family member with a written copy of emergency procedures and contact information (see Appendix D – Emergency Procedures and Contact Information). A copy of the Operations Plan and Health & Safety Binder will be kept on site by the Agent in Charge and will contain all material safety data sheets (MSDS), see Appendix F.

2.3. CULTIVATION PLAN

2.3.1. PLANTING METHODS AND MEDIUMS

Medical cannabis will be cultivated outdoors in beds at an outdoor cultivation area (see Attachment B – Site Plans, Floor Plans and Elevations).

Final Planting will be done in beds, outdoors. Each bed will be filled with an organic, nutrient-rich proprietary soil formula. A complete list of base soil and amendments will be recorded in the Lead Cultivators Handbook. All soil and amendments will be OMRI (or equivalent) certified and MSDS for each applicable amendment will be recorded in the Lead Cultivators Handbook. The total amount of plants per bed is dependent upon the cultivar and run length.

The on-site immature plant area consists of one (1) 20 x 50 ft greenhouse that will be used from April to June. The floors are permeable, native soil. There are no beds, the greenhouse is a temporary area for potted plants. Transplants use potting soil in 3" to 1 gallon pots.

The power for the fans and supplemental fluorescent lighting is from GRID. The greenhouse will comply with International Dark Sky Association Standards. The light emitted from the greenhouse will be covered at night as not to disturb the neighbors or surrounding environment.

2.3.2. IRRIGATION AND FERTILIZATION PRACTICES

WRL will implement water resource management strategies to address water needs for the commercial medical cannabis cultivation described herein. This plan may include but not be limited to:

- Annual forbearance as determined by a Water Availability Analysis
- Obtaining a Lake or Streambed Alteration Agreement for the water diversion works and storage through the Department of Fish and Wildlife (DFW)
- ➤ Enrollment in the State Water Quality Control Board's (SWRCB) Cannabis Cultivation Discharge Program (Order WQ 2017-00230DWQ), which includes preparation of a Site Management Plan (SMP).

Water for the Project will be sourced from a well. WRL registered with the SWRCB as a Tier 1 low risk Cultivation site.

The *Lead Cultivator* will be solely responsible for the implementation of the irrigation and fertilization program and all product handling.

A proprietary nutrient solution is prepared as needed by the *Lead Cultivator* and housed in a light-resistant, agricultural grade fertilization holding tank at the site. The solution is formulated by manufacturer instructions. The subsequent nutrient is then dosed with either an agricultural base or acid in order to ensure proper pH prior to feeding. MSDS and manufacturer labels will be available onsite.

Irrigation and fertigation of plants will occur initially via hand water. At this stage the plants are juvenile and planted in a container; therefore, the amount of irrigation and fertigation needed is better controlled via hand watering. Upon final planting, plants will be irrigated and fertilized using drip emitters specifically tailored to the application. Additional hand watering/feeding will be implemented at this stage at the direction of the *Lead Cultivator*, as needed.

Estimated Annual Irrigation Water Usage (Gallons) Per 10,000 SF of Cultivation

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
-	-	-	-	-	10,000	20,000	20,000	20,000	10,000	-	-

The table above outlines the estimated irrigation water usage for WRL during a typical year. Irrigation water usage will be dependent on weather conditions.

2.3.3. CULTIVATION SCHEDULE

April 1 - June 1: Raising Nursery Stock, Initial Transplant

All plant samples used in WRL cultivation sites will be composed of clones purchased from a licensed nursery. The *Lead Cultivator* will examine the clones and approve initial planting to begin. Upon the *Lead Cultivator's* approval, the *Initial Transplant* will commence. The rooted clones will be planted directly into 2 gallon pots. This point in the cultivation process most often referred to as the 'vegetative' cycle. Due to container and plant size, utilizing a hand watering method is most effective. The *Initial Transplant* phase lasts from six to eight weeks depending on the desired outcome.

When the *Lead Cultivator* has determined the plants have achieved desired height and plant growth density for final transplant, the plants are directly planted into a raised bed. Upon final transplant into the raised beds, a drip irrigation / fertilization system will be implemented.

June 1 - Nov 1: Vegetative Growth and Bloom Phase

During this phase, plants will continue vegetative growth while transitioning into flowering. Once the plants enter the budding stage they will be fertilized using a proprietary blend of high phosphorus fertilizers as well as aerobic based supplements.

Once the plants enter in the final bloom or flowering phase, they will begin to expend energy into the production of flowers, therefore, ceasing vegetative growth and begin to flower. The entire flowering process, including the transitional and final bloom phases, will last one hundred twenty (120) to one hundred fifty (150) days depending on strain variation and weather conditions.

Oct 1- Nov 1: Harvest

Once the Bloom Phase has concluded and the *Lead Cultivator* has determined the plants are at their peak, harvest procedures will be initiated (see *Harvesting/Processing Plan* for harvesting and processing procedure).

November 7 - February 1: Repair, Upgrade and Recondition Phase

WRL will inspect all infastructure wear and replace as necessary. The raised beds will be turned and a cover crop planted. The irrigation system will be inspected and repaired or replaced, as appropriate. Winter road and site maintenance will begin in line with procedures outlined in the *Site Management Plan*. The *Agent in Charge* and the *Lead Cultivator* will meet weekly to determine the best action plan for the upcoming season.

2.3.4. Noise Source Assessments and Mitigation Plan

Noise source will be from the fans. The fans will not exceed 60 decibels at 100 ft as measured with a decibel meter. See Appendix E for fan data sheet for fans of similar nature. Potential noise impacts to protected species will be identified as part of the NTMP and the fans will be adjusted accordingly if species of concern and habitat are found.

2.3.5. ENERGY PLAN

The property uses grid power. The power for the fans and supplemental fluorescent lighting is from the grid. Applicant will meet renewable energy requirements by participating in PG&E and Redwood Coast Energy Authority's renewable energy program.

2.3.6. PRODUCT INVENTORY AND TRACKING

Wilma Ranch will be enrolled in Metric upon issuance of State Annual Cannabis Cultivation License.

Inventory of all plants shall be performed by the *Agent in Charge* and *Lead Cultivator*. Batches of plants are inventoried by plant count. This accounts for any plants that have been added to inventory from a permitted medical cannabis nursery and any plants that were removed from inventory (due to disease or pest infestation) or any plants moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented. After further investigation, any appropriate corrective measures will be taken.

Tracking the Change of Plants to Bulk Inventory

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This provides accurate yield information — a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future batches. This information is added to the records created in the previous phase. Specific details that are recorded include:

- Weight after trimming
- Staff identification (at each step)
- Physical location of the plant material at all times

Reporting

The Master Log will contain reports on the harvest process, providing total weight harvested and trimmed at each weigh point, and compares that to final weight post-trim, including waste. Discrepancies are traced to the source, documented, and reported to the *Agent in Charge*. After investigation, any appropriate corrective measures are taken. All cultivation and harvest records are retained for a minimum of five (5) years.

2.4. PROCESSING PLAN

Wilma Ranch will work with an off-site processing facility and primarily produce dried bucked whole plant wholesale to distribution. The applicant resident family members (Lead Cultivator and Agent in Charge) reserve the right to hand or machine trim on site if necessary.

The Lead Cultivator will be responsible for each aspect of the procedure including use of harvesting tools, proper harvesting techniques and fresh harvested plant handling, trimming machine use and handling of cured processed flowers. This will also include the use of rubber gloves, face masks and hand washing requirements. Access to any part of the onsite Drying and Curing Facility will be limited to the Agent in Charge, the Lead Cultivator.

2.4.1. HARVESTING

Harvesting will be done by hand. Each harvester will be utilizing an agricultural grade, spring loaded, hand held anvil style pruner. Each harvester will be trained by the Lead Cultivator on the use of the pruner and the methods by which each plant is to be harvested. In addition, WRL will provide all harvest workers with proper hand, eye, body and respiratory safety equipment.

At the time of harvest, each plant will be recorded into the master log. Each plant will be harvested individually. All waterleaf around the flowers are manually pruned. The plants are then cut into branches, approximately sixteen inches (16") long. The branches are then transported to shed and the garage for drying and curing.

2.4.2. DRYING AND CURING

Prior to entering the on-site drying and curing facilities, the product will be examined, weighed, recorded and logged into the Master Log by the Agent in Charge. Branches will be hung on racks in sheds to air dry and cure or on racks within the dry shed which will have dehumidifiers/heaters and circulation in the form of wall fans, exhaust fans and box fans. Each rack will contain the original numbered tag(s) of the plant(s). The exact date and time of day along with the identification numbers of each plant(s) will immediately be recorded into the Master Log.

The drying and curing process takes between five (5) and seven (7) days. The Agent in Charge and the Lead Cultivator will be checking the facility several times per day to monitor the progress. Once the material has reached the desire consistency the processing will begin.

2.4.3. NUMBER OF EMPLOYEES

See Section 2.2.

Wilma Ranch, LLC is a family run operation. Applicant and resident family members act as the following Lead Cultivator and Agent in Charge. No employees are currently used, however acknowledges employees may be necessary in the future and will comply as necessary at that time.

2.4.4. SUMMARY OF EMPLOYEE SAFETY PRACTICES

See Section 2.2.5.

2.4.5. TOILET AND HANDWASHING FACILITIES

WRL has an existing restroom located at main residence. The restroom is clearly marked, well lit and cleaned regularly. It includes a working flush toilet as well as a sink with hot and cold running water and eyewash station. Anti-bacterial Liquid Soap and paper hand towels will be made available. Above the sink in a conspicuous place a "Before Returning to Work" hand washing procedure placard will be posted.

2.4.6. PLUMBING AND SEPTIC SYSTEM

On-site wastewater treatment will be achieved with an existing septic system for the existing residence. Permitting will be required with Planning & building.

The septic system for the property was designed to accommodate a three bedroom home. Restroom access will be available for all at the existing residence which is located less than 50 feet from the proposed cultivation area.

The Domestic water is sourced from the well.

2.4.7. DRINKING WATER

WRL will provide safe, clean, purified drinking water via filtered water located in the main residence. Clean cups will be made available.

2.4.8. ROAD USE AND MITIGATION STRATEGY

WRL started its initial road repair and maintenance activities. All roads are out sloped. In addition, rolling dips have been inserted at regular intervals as required for standard maintenance for logging roads. All outlets for water are clear of debris and allow free flow of water from the road surface. All berms have been removed. In addition, all roads on the property are rocked. Once initial road repair and maintenance activities are complete, seasonal maintenance will include re-grading of out slopes and rolling water bars to ensure good run off. WRL will also replace rock where necessary.

WRL will conduct road maintenance inspections during any and all *major rain events*. WRL considers a *major rain event* to be any rainfall above one half inch (1/2"). This inspection will include observing existing features for any minor or major issues, such as rolling dips, standing water in outlets, and the diversion of water running directly down and eroding the road surface.

WRL will implement procedures to reduce traffic on shared roads. Transportation and deliveries of medical cannabis and associated supplies will be delivered in bulk to minimize road impacts. Because the operation is run by resident family members, this will reduce the number of daily trips to the property. WRL will encourage ride sharing to and from the site.

2.4.9. ON-SITE STRUCTURES

The two existing residences and a guest house are occupied by three siblings that reside on the farm year round. (See 1.1 Project Narrative and Site Plan for location and other details).

A proposed metal building for the drying of the cannabis will be constructed upon building permit approval ASAP.

2.5. PARKING PLAN

Employees will park in designated employee parking located at the farm. There is room for 5-6 vehicles to park. Additional parking is located at each residence. Each residence is walking distance to the cultivation area. Carpooling is also encouraged and more parking is available at the end of Miller Ranch Road. See plot plan for parking locations.

2.6. SECURITY PLAN

Two locked gates are present. The first is located at the entrance to the property boundary, the second at the entrance to the driveway. A *No Trespassing and ALL VISITORS MUST REGISTER* sign is posted near the gate. Cultivation facilities will be completely enclosed by a six foot (6') security fence with a locked gate. The cultivation and processing facility will have security lights that illuminate the entrances and parking areas. Wilma Ranch, LLC is proposing to have security cameras at the entrance to the site and harvest storage with data storage for up to thirty (30) days. The storage area will have an alarm system in addition to a watch dog.

All potential employees will be subject to a criminal background check prior to employment. Employees will be issued a company issued ID badge and will be required to display the badge at all times while working at the subject property.

2.7. TRANSPORTATION AND DISTRIBUTION PLAN

Transportation will be handled via a third party, contracted, licensed transporter/distributer in accordance with MMRSA and Metrc. All merchantable products will only be distributed through licensed manufacturer or distributor. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributer/transporter. This distribution document is required for each movement of packages and will be recorded in the Master Log.

The Agent in Charge and the Lead Cultivator are responsible for performing a physical inventory of all packages being transported, ensuring that the physical inventory reconciles with the transport manifest, as well as the packaging material is intact and the labeling is secure. The distribution document records the current location and status of the packages, such as "in-transit" or "received." The licensed distributer must also create detailed transport manifests for the package distribution. The manifest contains details such as:

- > Time of departure
- > Time of arrival
- Product and product weight
- > Route to be travelled
- Origin and destination addresses

3. RESOURCES

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- State Board of Equalization. Information on the Sales and Registration for Marijuana Sellers. June 2007. http://www.boe.ca.gov/news/pdf/173.pdf.>
- State of California. Guidelines for the Security and Non-Diversion of Marijuana Grown for Medical Use. August 2008.
 - http://www.ag.ca.gov/cms attachments/press/pdfs/n1601 medicalmarijuanaguidelines.pdf>

Appendix A: Personnel Acknowledgement Form

Personnel Acknowledgement Form

It is the intention of Wilma Ranch, LLC to create an enjoyable, safe and sane workplace. We feel that understanding and compliance with our Operations Manual will create just that. It is the responsibility of each member to read and understand the procedures outlined herein. If after reading and reviewing this entire document, you have any questions please see the Agent in Charge immediately for clarification. By signing this document below, it confirms your reading, understanding and adherence to the entire *Wilma Ranch*, *LLC*OPERATIONS MANUAL FOR MEDICAL CANNABIS CULTIVATION.

imployee sign and de	ate	

<u>Appendix B</u>: Site Plan, Floor Plans and Elevations

Appendix C: Pesticide Storage, Handling and Application Plan

Wilma Ranch, LLC

4. PEST MANAGEMENT PLAN

Cultural Pest-Management Control Methods

Wilma Ranch implements a bio-security protocol that is sensitive to track all inputs and outputs from potential pests from entering and exiting the farm. These include a visitor log, limiting vehicle and foot traffic access in and around the farm, regular pest inspection and a preventative organic pest prevention program using beneficial, sulfur and Plant Therapy, Grandevo, and Venerate.

Biological Pest-Management Control Methods

Regular pest inspection and a preventative organic pest prevention program using beneficial predators, sulfur and Plant Therapy, Grandevo, and Venerate.

Chemical Pest-Management Control Methods

Regular pest inspection and a preventative organic pest prevention program using beneficial predators, sulfur and Plant Therapy, Grandevo, and Venerate.

Chemicals to be Applied at any Stage of Plant Growth

Product Name	Active Ingredient (s)
Sulfur	Sulfur
Plant Therapy	Soybean Oil 38% Organic Peppermint Oil 5% Citric Acid .25%
Grandevo	Chromobacterium subtsugae strain PRAA4-1 and spent fermentation media* 30%
Venerate	Heat-killed Burkholderia spp. strain A396 cells and spent fermentation media* 96.46%

5.

PESTICIDE STORAGE, HANDLING AND APPLICATION PLAN

All pesticides, disinfectants, fungicides and agricultural chemical products used by the Wilma Ranch, LLC (WRL), will maintain strict compliance with standards imposed by the Humboldt County Agricultural department and State of California Department of Agriculture Department and US Environmental Protection Agency. The manager will maintain a current Private Applicators License with the Humboldt County Agricultural Department. This license will be posted and a copy will be entered into the Manager's Handbook and available for view by any regulatory agency deemed appropriate by Humboldt County or State of California.

Storage

All pesticides, disinfectants, fungicides and agricultural chemicals will be secured in an appropriate locked and labeled housing and accessed only by those employees that have been trained under the guidelines of State of California Agricultural Department Personal Pesticide Application License

guidelines in handling, application and disposal of each product. Entry into the locked facility will be logged by the Lead Cultivator. This log will include: The name of employee removing the material, the date and time of day and the amount and type of pesticide removed.

Any over-the-counter pesticide products may be applied by either the *Manager* or trained personnel in accordance with State of California Agricultural Department's Private Applicators License criteria. Training of employees will be in accordance with *State of California Private Applicators License* criteria. These products will be limited to safe chemicals recognized by the Humboldt County Department of Agriculture, the California Department of Agriculture and the Federal EPA. Copies of all MSDSs and labels will be clearly identified and maintained onsite at all times in the Lead Cultivators Handbook. WRL will make saline eye wash stations available to its employees where ever pesticides are stored.

Handling

The handling of pesticides/fungicide will be done in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines. Handling will include, transportation from retail outlet to cultivation site, logging, and entering secured, labeled storage, mixing, preparation, transport to application locations on site, application, and disposal. These activities will be logged into the Master Log immediately by the *Lead Cultivator*. By having a strictly monitored Pesticide Management plan in place, WRL will strive for a "ZERO SPILL POLICY". In the event of a spill, WRL will maintain on site an Emergency Containment and Clean Up policy in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines.

WRL will also maintain on site in a clearly marked and accessible secure location any materials deemed necessary for clean up or spill containment and abatement. WRL will maintain a well-marked and easily accessible plan for accidental personnel exposure as well as proper applicators training as set forth by *State of California Agricultural Department Personal Pesticide Application License* guidelines in the event of such accidental exposure. Any spills or accidental personnel exposure will be reported to the appropriate agencies as deemed necessary by *State of California Agricultural Department Personal Pesticide Application License* guidelines. These incidents will also be documented into the Master Log by the Lead Cultivator.

Application

All application will be done in accordance with State of California Agricultural Department Personal Pesticide Application License guidelines. A copy of all applications will be manually entered into the Master Log. Proper eye, face and body protective wear as well as approved respirators shall be provided by WRL and worn and available at all times during application of all pesticides/fungicides. A preventive application program per manufactures directions and label requirements will be established from the onset of the plants initial transplant. Application frequency will vary with each phase of growth or infestation pressure. This will help to ensure the least amount of pesticide/fungicide will be needed. Application will end no less than thirty days before harvest or by manufactures able requirements, whichever is longer.

During application factors, such as wind, temperature and humidity will be taken into account. This will ensure that the pesticide/fungicide is used in the most efficient manner and will mitigate drift. Pesticides will be applied using a variety of methods including atomizer, back pack sprayer and air less sprayer. Nozzle types and pressure settings will be determined by manufacture directions. Anywhere pesticide is applied WRL will provide a saline eye wash station in case of accidental exposure.

Disposal

Any mixed solutions will be used to their entirety. If there is a surplus of used mixed solution, it will be disposed of per guidelines set forth by *State of California Agricultural Department Personal Pesticide Application License* procedures. After the applicator has finished application, the protective wear shall be discarded and disposed of per *State of California Agricultural Department Private Applicators License* guidelines. All bottles, containers or receptacles that have come into contact with, or contained, any product that falls under the state's guidelines for pesticides, disinfectants, fungicides and agricultural chemicals shall be washed, rinsed and or disposed of according to strict EPA and *State of California Agricultural Department Private Applicators License* guidelines. Proper training of employees in rinsing, washing and disposal shall be overseen by the Licensed Lead Cultivator on premise. All washing, rinsing or disposal of any product packaging, applicator or protective clothing will be logged into the Master Log.

Appendix D: Emergency
Procedures and Contact
Information

Emergency Procedures Instructions Wilma Ranch, LLC

The first priority in the event of an emergency is for the safety of all people present. Move quickly out of area danger. Meet at assigned meeting place to get a headcount. Enact Emergency Procedures.

Emergency Phone Numbers

Dial 911 for Fire/Police/Ambulance:

- 1. Tell the operator which emergency service you want
- 2. Wait until the service answers
- 3. Give the following address:

701Miller Ranch Road, Garberville CA 95542

Humboldt County APN: 216-022-013

Nearest Cross Street: Bell Springs Road, Past New Harris

4. Do not hang up until told to do so by the 911 Operator

Other Emergency Contacts

Humboldt County Sheriff: 707-445-7251

Beginnings Volunteer Fire Department: 707-923-2303

Humboldt County HazMat: 707-445-6215

Humboldt County Ag Dept.: 707-441-5260

Fire and Emergency Procedures Checklist

You must know and understand what to do if a fire occurs. Your first concern is the immediate safety of visitors and staff; secondly, the need to call emergency services and then to contain the fire but only if it is safe to do so. If help is available, allocate responsibilities to others to create a competent firefighting team.

- Evacuate people from the area
- If it is safe to do so, switch off power to all equipment
- Call the fire department (dial 911)
- If a small fire, use your fire extinguisher if it is safe to do so try to contain and extinguish the fire
- If the fire is near a fuel tank, do not attempt to extinguish the fire retreat to a safe distance
- Be prepared to direct the fire service to the scene (open locked gates, put flags or signs at turnoffs).

Spill Procedures Checklist

You must know and understand what to do if a spill occurs. Your first consideration is the immediate safety of visitors and staff; secondly, the need to call emergency services and then contain the spill if it is safe to do so. If help is available allocate responsibilities to others to create a competent team to deal with the spill.

- If the spill is from the hose or tap, shut the isolation valve
- Warn people in area of the spill evacuate if necessary
- Remove sources of ignition if flammable substance present
- Evaluate the spill only respond if you believe it is safe to do so
- Refer to the safety data sheet or call on an approved handler or other specialists for advice
- If necessary, call emergency services and advise local authority
- Put on safety equipment (e.g. overalls, boots, gloves, eye protection, etc.)
- Contain the spill if it is safe to do so utilize a drip tray or oversize container or spill kit to soak up the substance
- Dispose of waste safely as set out in the material safety data sheet

Incident Reporting

Every accident resulting in injury or damage to farm property must be reported to your manager immediately.

Respond to the accident promptly and positively - Stay calm

Collect relevant information about the accident

Develop and take remedial actions

Complete insurance claims and reports required

First Aid

- A first aid kit must be kept on the premises and maintained
- All staff must know basic first aid procedures

Minor Injury Accidents

- Minor cuts and abrasions must be attended to immediately
- If in doubt contact a physician or call 911

Serious Injury Accidents

- Call an ambulance immediately (dial 911)
- Seek the assistance of any first responder
- Stabilize Victim
- Advise your manager

Property Damage

• All damage to farm property must be reported to your manager

Emergency First Aid-Procedures Control of Bleeding

- 1. Direct pressure use your hand(s).
- 2. Elevate (raise) the limb
- 3. Apply a pad and firm bandage.
- 4. If necessary use clean rags or clothing.

Remember!!

- Always check circulation below the bandage!
- If there is tingling, numbness or blueness loosen the bandage.

Management of Burns

- 1. Cool the burnt area with cool water for 10-15 minutes
- 2. If necessary, cover the burn with a clean dressing or plastic wrap before removing person to medical aid.

Remember!!

- Do not burst blisters.
- Do not remove clothing that is stuck.
- Do not apply creams

Management of Eye Injuries

Foreign bodies in the eye(s)

- 1. Wash the eye(s) with eyewash or clean water.
- 2. If the foreign body is stuck to the eye DO NOT attempt remove.
- 3. Place covering over the eye and obtain medical attention.

Management of Chemicals in Eye(s)

- 1. Wash the eye(s) with clean cool water for at least 15 minutes.
- 2. Wash from near the nose outward.
- 3. Always wash under the upper eyelid.
- 4. Obtain medical attention

Breathing

If a person is breathing but unconscious turn them on their side to prevent tongue swelling or vomit from obstructing airway.

If person is not breathing

- · Check airway for blockage and clear
- Call 911
- Administer CPR

Location of Firefighting Equipment, Spill and First Aid Kits

A fire extinguisher is located in the following places:

- All Power or Fuel Sheds
- All Cold Frames
- Nutrient and Fertilizer Storage
- Drying and Processing Facility

A first aid kit is located in the following places:

- All Power or Fuel Sheds
- Cultivation Site
- Nutrient and Pesticide Storage
- Drying and Processing Facility

A spill kit is located in the following places:

- Power or Fuel Shed
- Cultivation Site
- Nutrient and Pesticide Storage

Appendix E: Fan	Specifications
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NOISE Specifications

FANS

Air King 30 Inch - 7450 CFM Wall Mount Fan specifications:

blade size: 30"

motor: 1/4 hp, 120v totally enclosed
product dimensions: 33.5" | x 24"w x 33.5"h

• controls: rear mounted pull cord switch

power cord: black, 10' 3-conductor, sjt type

cfm (high/med/low): 7450 / 6090 / 3450

rpm (high/med/low): 1010 / 860 / 530

amps (high/med/low): 2.2 / 1.6 / 0.6

db (high/med/low): 68 / 64 / 50

weight: 53.5 lbs

https://www.rewci.com/air-king-99538-industrial-quiet-wall-mounted-fan.html

Appendix F: Site Management Plan

SITE MANAGEMENT PLAN

This document serves as the Site Management plan for site Wilma Ranch, LLC located **701 Miller Ranch Road (APN 216-022-013, 216-022-013)** pursuant to State Water Resources Control Board Order WQ 2017-0023-DWQ.

One of the requirements of the order is to prepare a site management plan (SMP) for all sites that are enrolled under Tier 1 of the order, including all of the elements listed below.

On December 14, 2019 applicant applied to the State Water Resources Control Board Order WQ 2017-0023-DWQ. Cannabis General Order Application Number: 422978 and is awaiting a WDID.

Under the General Order applicant is registered as Tier 1 low risk.

1. LEGIBLE MAP

Legible Map(s) of the property identifying the following items where applicable -

- a. Site topography
- b. Perimeter of land owned
- c. Perimeter of land leased
- d. Buildings with use identified
- e. Storage locations of chemicals used, if any (i.e. fertilizer, pesticide, petroleum)
- f. Production area(s) perimeter (e.g. Cultivation areas, greenhouses)
- g. Cleared and developed areas
- h. Surface watercourses and water conveyances (e.g. ditches, piping)
- i. Drainage patterns & flow path directions
- j. Roads, including specific markings for all stream crossings
- k. Features scheduled for upgrade, cleanup, remediation, and restoration
- 1. Points of diversion of water sources
- m. Locations of water pumps and associated facilities
- n. Water storage type and location (storage tanks, ponds, bladders)
- o. Unstable features
- p. Human waste facilities (e.g. septic tanks and leach fields, privy, composting toilet)
- q. Map legend

See attachment for maps - Applicant worked with SL Consulting to create Site Plot Plan.

2. CURRENT CONDITIONS

Applicant has assessed the current conditions of the site (as applicable to the standard conditions of the order) and has included the features, as indicated on the map, needing improvements in the table below. Also included is a detailed list of specific management practices designed to meet standard conditions, incorporating applicable standard BMPs, and any improvement work needed to bring site features into compliance with the standard conditions.

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Future site improvements are included in Table 1 with a prioritization and implementation schedule for corrective action based on potential impacts to the beneficial uses of water. Applicant is requesting a Tier 1 status.

Management practices include the following:

Controllable sediment delivery sites: There are no points of controllable sediment delivery sites located on the main Miller Ranch Road (shared access) or the private driveway, see Road Construction and Maintenance below. Continuing to place more rock and maintain the out-slope contour will prevent sediment delivery to the unnamed tributary of Tom Long Creek.

Riparian protection: no existing disturbance, meets standard conditions. Residence and cultivation site is located over 350 feet from stream course.

Slope & Setbacks: The existing cultivation is setback from the northern parcel line by approximately 1,300 feet and the western line by at least 200 feet. The cultivation is setback from the nearest water course by over 350 feet. The cultivation area is located on slopes less than 15% on the top of the ridge.

Road construction and maintenance: All roads on property are pre-existing gravel surfaced roads, driveways are out sloped and with no in-board ditches. Miller Ranch Road, which serves as the community easement extends approximately .25 miles, is out-sloped has no inboard ditches or culverts. The 701 Miller Ranch Road private driveway is privately maintained by the applicant, is out-sloped has no inboard ditches and 2 existing drainage culverts (one on the owner's property). The culverts are metal and in good condition. Roads are maintained as recommended in the PWA "Handbook for Forest, Ranch & Rural Roads". Roads are routinely inspected and maintained with surface gravel, rolling dips, water bars and ditch/culvert clearing as necessary.

Spoils storage and disposal: Not applicable

Chemical handling and management: Gasoline fuel for rotor-tillers and weed-whackers will be stored in approved tanks with secondary containment. A total of 10 gallons of gasoline fuel will be stored in two (2), 5-gallon gas cans with spill proof dispenser, stored in leak proof plastic totes in the garage. Machine maintenance will be performed on site may include motor oil and 2-stroke mix oil. These products are purchased and used when needed, not stored in bulk on site.

Propane fuel is stored in a 250 gallon tank which will be properly anchored and secured. Residential propane is used for cooking and heat. Portable propane heaters use 5 gallon tanks and may be used in dry shed.

Simple Green and rubbing alcohol (approximately 1-2 gallon of each) are stored within the storage shed.

For fertilizer use and pest control see section 4. Chemicals below.

Waste handling and disposal: All refuse is stored in cans with locking lids, and removed biweekly and/or as needed. All recycling is separated and refuse is taken to the Redway Transfer station.

Irrigation runoff: No runoff, meets standard conditions. Garden is heavily mulched with drip irrigation on timers, a low water consumption strategy is implemented.

Water storage and use: is detailed in item 6 below.

Applicant is working to ensure full compliance with all necessary permits and requirements. A site visit by We Dig It was conducted in Spring 2019 and will continue consultation for future improvements to meet standard conditions

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and ensure BMP's are being met. See Table 1 below for Features that need improvement based on the Culvert Inspection Report (section 5).

Any proposed work in streams and wetlands that require site-specific review to determine if the work requires a permit by the Army Corps of Engineers and a Water Quality Certification by the Water Board will be acquired. Additionally, any future proposed work in streams and wetlands shall be designed by a qualified registered professional and shall incorporate applicable standard BMPs. All relevant permit information for coverage of proposed work in or near streams or wetlands will be submitted with reporting documentation.

Table 1: Features that need improvement

Unique Map Point(s)	Map Point Description	Associated Standard Condition	Temporary BMP	Permanent BMP	Priority for action	Time Schedule for completion of Permanent BMP	Completion Date
Well	Existing installed 1991		Water Source	Applicant filed for repair permit and awaiting WCR	1	Jan, 2020	
Remove/ Restore/ Remediate	Lower Garden		Cultivation area decommissioned in 2018	Remove all cultivation material, non-native soil, apply native seed mix &weed free straw	2	Dec, 2021	
Restore	Existing old timber haul Road to Lower Garden		Cultivation area decommissioned in 2018	Re-seed, seed free straw and block driving access with large log	3	Dec, 2021	
Remove/ Restore/ Remediate	Yurt Garden		Cultivation area decommissioned in 2018	Remove all cultivation material, non-native soil, apply native seed mix &weed free straw	4	Dec, 2021	
C2	Culvert	I.A.2.d	Inspected 12-15- 19	Armor Outlet	5	Dec, 2021	

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3. DESIGN DRAWINGS

Applicable design drawings and schematics for watercourse structures, fish passages, roads, septic tanks, fill prisms, pads, ponds, or any other constructed feature that has been designed or engineered.

The septics were all pre-existing and meet standard conditions. There are no new designed or engineered features proposed at this time.

There are no ponds. Water Source is a well. Power is grid (PG&E).

See Appendix H for schematic of Septic Systems. Two residences and guest house (yurt) have existing septic systems. Installed in 1990, the first residence is equipped with a 1,200 gallon septic tank with a standard leach field. Installed in 2008, the second residence is equipped with a 1,000 gallon septic tank with a standard leach field. Installed in 2016, the Guest House is equipped with a 1,000 gallon septic tank with a single 50' bio-diffuser.

4. CHEMICALS

List of chemicals stored onsite, and information about use (e.g., quantities used and frequency applied).

All fertilizer is organic, is purchased and used as needed, no long term storage on site. All chemicals and fertilizer will be securely stored in the storage shed.

Liquid organic fertilizer applied weekly per manufactures directions. All soil amendments are purchased and applied immediately in the spring. This is an example of what was applied in 2017. The fertilizer regime may change year to year.

	Manufactures Directions			Actual
Туре	lbs/100sq. ft	10,000ft sq	# bags	Farm Use
Worm Castings	10	1,000	20	20
Fish/Bone Meal	1.1	113	2	2
Chicken Manure	12.5	1,250	42	40
Bat Guano	3	300	10	10
Green Sand	10	1,000	20	3
Trace Minerals	10	1,000	20	3
Rock Phosphate	4	400	8	9
Dr. Earth	1.8	180	3.6	3
Kelp Meal	2	200	4	

Chemical Pest-Management Control Methods

Regular pest inspection and a preventative organic pest prevention program using beneficial predators, sulfur and Plant Therapy, Grandevo, and Venerate.

Chemicals to be Applied at any Stage of Plant Growth

Product Name	Active Ingredient (s)				
Sulfur	Sulfur				
Plant Therapy	Soybean Oil 38%				
· rant morepy	Organic Peppermint Oil 5%				
	Citric Acid .25%				
Grandevo	Chromobacterium subtsugae				
O. a. i.a.	strain PRAA4-1 and spent				
	fermentation media* 30%				
Venerate	Heat-killed Burkholderia spp.				
Venerate	strain A396 cells and spent				
	fermentation media* 96.46%				

5. MONITORING

Monitoring element to ensure that BMPs are being implemented and to evaluate their effectiveness. Include a plan to inspect the site to evaluate the effectiveness of corrective action and identify where additional work may be needed.

Property owner will inspect site quarterly and during heavy storms to ensure standard conditions are maintained. This includes inspection of all drainages, roads, and gardens to ensure no erosion, slides or problems occur. Immediate action of mulch, rock, ditch or culvert clearing will be implemented if any problems are found.

Winterization: Applicant winterizes cultivation area by mulching and/or planting a cover crop. Soil is reused and built with perma-culture practice. If necessary any spent soil will be kept in a depressed area covered with a tarp. Water systems are drained and turned off to prevent damage by frost. All refuse and any remaining supplies, fertilizers, etc are stored away in covered and dry shed.

Site visit was conducted in December 2019 by "We Dig It LLC" the company the Seely Creek Road Association contracts for road maintenance and repair. All culverts were inspected and reported as following.

CULVERT INSPECTION REPORT – 12-15-2019

Location	Size	Material	Condition	Туре	Notes/Plan
C1	24"x25'	Metal	Good	Ditch relief	On BLM
					neighboring parcel
C2	16"x40'	Metal	Good	Ditch relief	Needs outlet armored
					Post road work and out
					slope reduced

6. WATER SOURCE & USE

Plan shall record water source, relevant water right documentation, and amount used monthly.

Water Source: All cannabis irrigation demand is sourced from existing groundwater well. Applicant has found the original well application with the county filed in 1991, however due to incomplete permit applicant has filed for repair permit and awaiting Well Completion Report. Applicant is working with Fisch Drilling.

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A total of 20,000 gallons of tank storage is located on the parcel.

Water Use: Amount Used Monthly Cultivation Irrigation (gallons):

Estimated Annual Irrigation Water Usage (Gallons) Per 10,000 SF of Cultivation

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
2	-	-	-	5,000	10,000	12,000	15,000	15,000	15,000	8,000	-

The table above outlines the estimated irrigation water usage for WRL during a typical year. Irrigation water usage will be dependent on weather conditions. A water meter will be installed to meter cannabis irrigation and reported as per State Water Board.

Water Conservation Measures: include water meter, rainwater, drip irrigation and timers, heavy mulching. Weekly inspection for leaks and monthly water logging for water board reporting requirements.

No surface water diversions for cannabis irrigation

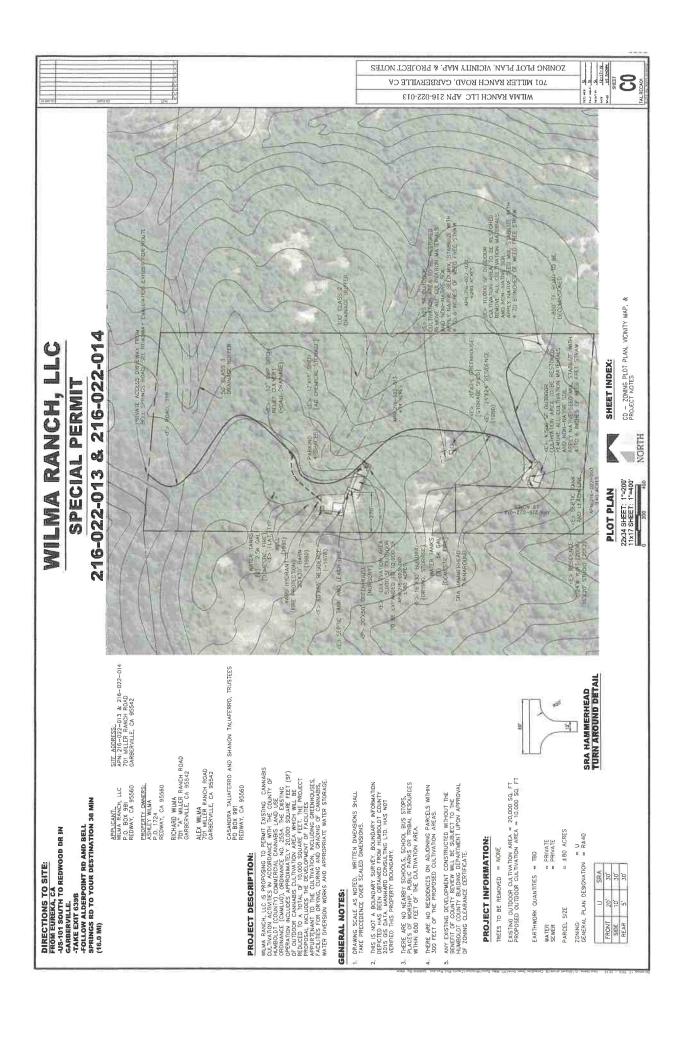
Name of legally responsible person (LRP): Casandra Taliaferro

Title (owner, lessee, operator, etc.): Wilma Ranch, Inc

Signature: Coach Calp Date: 12 2019

WRPP prepared by (if different from LRP): Casandra Taliaferro

WRPP prepared on: December 15,2019



OPERATIONS MANUAL WILMA RANCH, LLC

Appendix G: RRR Plan

OPERATIONS MANUAL WILMA RANCH, LLC

Appendix F: Site Management Plan

RRR Plan

Wilma Ranch LLC

701 Miller Ranch Road, Garberville, CA 95542 APN 216-022-013, 216-022-014

To achieve compliance for Humboldt County Cannabis Cultivation application located at 701 Miller Ranch Road, Garberville, CA on APN 216-022-013 this document serves as the relocation, retirement and remediation plan for pre-existing cultivation areas.

The total pre-existing cultivation square footage on the property between 4 separate garden locations was 20,000 square feet (sf) (see site plan). The first pre-existing 10,000sf cultivation area known as "Lower Garden" was decommissioned in 2018 and located in a meadow identified as a wetland by the biologist (see biological survey). A secondary pre-existing 5,000sf cultivation area known as "Yurt Garden" was decommissioned in 2018 will be removed and restored. There is a small 635sf cultivation area near the second residence that was decommissioned in 2018 and will be removed and restored. The 5,000sf area known as the "Main Garden" will remain. As per the CCMLUO 2.0 applicant is eligible to retain 50% of pre-existing cultivation, thus 5,000sf of the "Lower Garden" will be relocated on site by expanding the existing "Main Garden" which is an environmentally superior area as noted in the biological survey. The "Main Garden" will be expanded to a total of 10,000sf, no grading or tree removal will be required. All cultivation areas were abandoned in 2018 due to uncertainty of the compliance process and cost. There is about 800 ft of existing old log skid road that provided access to the "Lower Garden" that will also be restored. Entrance to the road will be blocked with a large log to prevent future access. All decommissioned areas will be cleaned up in 2020 and will be completely restored by 2021.

All sites consisted of grow pots on native soil with no grading. No trees were removed for cultivation activities, no stumps are evident in either cultivation area. The "Lower Garden" was the site of a wetland meadow which left a small opening on a densely forested slope of mixed hardwood. Remediation efforts will include the removal of all existing cultivation materials including non-native soil, pots, fencing and waterline. All areas will be restored and stabilized with weed free straw and will naturally re-seeded themselves with surrounding native vegetation.



Lower Garden (10Ksf): Photo taken by Casandra Taliaferro on 12-15-19. Cultivation removed in 2018, area to be restored by 2020.



Yurt Garden: (4,500sf) Photo taken by Casandra Taliaferro on 12-15-19. Cultivation removed in 2018, area to be restored by 2020.



Small Residence Garden (625sf): Photo taken by Casandra Taliaferro on 12-15-19. Cultivation removed in 2018, area to be restored by 2020.

OPERATIONS MANUAL WILMA RANCH, LLC

Appendix H: Invasive Species Control Plan

Invasive Species Control Plan

Assessor Parcel Number (APN): 216 – 022 – 013 & 216 – 022 – 014

Prepared by:

Naiad Biological Consulting

Mason London MSc, Owner/Biologist

X Mayor Loon

Prepared for:

Wilma Ranch, LLC

P.O. Box 991 Redway, CA 95560

Date Prepared:

December 19th, 2019

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Section 1 Introduction

1.1 Purpose and Need

Section 55.4.12.16 of the Humboldt County Commercial Cannabis Land Use Ordinance (CCLUO), Ordinance 2599, states that "[i]t is the responsibility of a certificate or permit holder to work to eradicate invasive species. As part of any application, the existence of invasive species on the project parcel need to be identified, including the type(s) of invasive plant species, where they are located, and a plan to control their spread. All invasive plant species shall be removed from the cultivation site and associated infrastructure using measures appropriate to the species. Removal shall be confirmed during subsequent annual inspection. Corrective action may be required if invasive species are found to have returned."

1.2 Biologist's Qualifications

The Invasive Species Control Plan was prepared by Mason London. Mason holds an MSc in Biology with a concentration in aquatic ecology from Humboldt State University. Mason also has 9 collective years of experience working professionally as a botanist, wildlife biologist, and aquatic ecological research scientist. Mason has worked in both Northern California and Southern Oregon targeting and eradicating invasive species for nonprofit land stewardship councils and government agencies.

1.3 Invasive Species Information

Not all non-native species are necessarily invasive species. For a species to be considered non-native, it means it has been introduced with human help (intentionally or accidentally) to a new place or new type of habitat where it was not previously found. Whereas, according to the USDA National Invasive Species Information Center, Executive Order 13112 (February 1999), "[a]n invasive species is defined as a species that is 1) non-native (or alien) to an ecosystem under consideration *and* 2) whose introduction causes or is likely to cause economic or environmental harm or harm to human health."

The invasive species list used for this Invasive Species Control Plan was derived from the California Invasive Plant Council (Cal-IPC), as required by the Humboldt County Board of Supervisors, in the Mitigation Monitoring and Reporting Program – Proposed Amendments to

Humboldt County Code Regulating Commercial Cannabis Activities (Mitigation 3.4-3b: Invasive plant species).

1.4 Assessment and Control Options

A physical survey of the parcel to determine the scope of the present invasive species will create a comprehensive starting point for management techniques. Several control options exist for eradicating invasive species; including biological, mechanical and chemical.

1.4.1 Biological Eradication

This option is generally used as a first line of defense for control of invasive species. The reintroduction of native species can, in some cases, create a host for insects and microorganisms which will feed on the invasive species and/or create an environment which will discourage new growth of the invasive planet. Because of this, competitive planting of non-invasive species can help to cultivate an environment which will discourage new growth of invasive plants.

Many invasive species become introduced to an area after a recent disturbance. By using native grasses or plants, in a restoration style planting or seeding, many invasive will become unable to establish and entrench the exposed soils.

1.4.2 Mechanical Eradication

This option is the most common short-term option for the eradication of invasive species. Hand pulling, or with use of tools such as a weed wrench, can be done easily during certain times of year when the soils are still moist, and roots are easily removed. Depending on the species, it can be important to remove the entire root because some species can regenerate from roots left in the soil. Other species need to be removed before their seeds fully mature in order to not promote aerial spreading of fertile seeds. In some of these cases, the removed plant matter will need to be removed from the property since some seeds are able to mature on a plant even when the plant has been removed from the ground. This method is ideal for populations of invasive plants that are smaller and can be easily managed with hands or hand tools.

For populations of invasive plants that cannot be easily or affectively managed by hand, use of weed whackers, tractors, or cutting tools may be required to eradicate or control the spread of certain species.

1.4.3 Chemical Eradication

This method is considered only as a last resort, if at all, since most commercial cannabis projects are operating under organic and/or natural growing techniques that never include the use of chemicals.

Section 2 Methods

2.1 Field Observations

On December 15th, 2019 the parcels (APN 216-022-013 & 216-022-014), located approximately 4.00 air miles south of Harris, California, Humboldt County (40°01'40.96"N 123°38'55.56"W), was visited in order to observe the presence of invasive species (Appendix B: Map 1). The project site (proposed cultivation area) is to occur entirely within the area of a large opening that has been historically utilized for cannabis cultivation and other associated activities. Three other sites on the property, which have had preexisting cannabis cultivation but will no longer be cultivated, were also investigated during the site visit (Appendix B: Map 1 & 2). The project site, as well as the surrounding area/habitat, was investigated and surveyed for invasive species presence during this visit.

2.2 Invasive Species Assessment

The Cal-IPC Inventory was used to determine invasive species of concern for the site visit investigation. The *Weed Control in Natural Areas in the Western United States* (UC Davis Weed Research and information Center, 2013) was utilized to determine specific species information and adequate eradication and management methods, as recommended by Cal-IPC.

Section 3 Results

3.1 Parcel Habitat

The habitat within the vicinity of the proposed project site, within the 80.42-acre parcel (APN: 216-022-013 is 74.50-acres and APN: 216-022-014 is 5.92-acres) consists of mostly second growth mixed hardwood and coniferous forest, and a few forested. The project site is to exist entirely within the open habitat.

3.2 Observed Invasive Species

Many non-native species were observed during the site visit investigation throughout the project site and the surrounding area, however, only a few invasive species were observed.

The invasive species observed in the project area, listed on the CAL-IPC inventory, include: bull thistle (*Cirsium vulgare*), fennel (*Foeniculum vulgare*), Scotch broom (*Cytisus scoparius*), pennyroyal (*Mentha pulegium*), and common mullein (*Verbascum thapsus*).

3.3 Invasive Species Information, Management and Removal Recommendations

3.3.1 Bull thistle (Cirsium vulgare)

Cirsium vulgare (Figure 1) was observed very sparsely in isolated locations in the proposed cultivation site Site 4 (Appendix B: Map 2). Cirsium vulgare is found everywhere in the United States, favors disturbed areas including rangeland, pastures, forest clear-cuts, roadsides and waste areas, and can also be seen in foothills, dry meadows and riparian areas. This species was introduced from Europe. Cirsium vulgare is not palatable to livestock and reduces the forage potential of infested pasture. Once Cirsium vulgare becomes established it can easily outcompete native plants.

Cirsium vulgare is considered to have ranking of Moderate Invasiveness by the Cal-IPC Inventory. The most feasible method of eradication for this species is by mechanical methods. According to the Weed Report from the Weed Control in Natural Areas in the Western United States, Cirsium vulgare can be effectively removed by "[t]illage, hoeing, and hand pulling... as long as they are done before flowering to prevent seed production. Any mechanical or physical

control measure that severs the root below the soil surface is very effective...[however], the plant must be cut off below the soil surface and no leaves should remain attached, or the plant will recover."

The removed plants should be bagged up and removed from the property to make sure plant material and fertile seeds do not promote repropagation.

3.3.2 Fennel (Foeniculum vulgare)

Foeniculum vulgare is particularly a problem in California but can be found throughout many western states. This species prefers open disturbed areas and has invaded roadsides, slopes, fields, grasslands, coastal scrub, riparian and wetlands areas and other natural communities. Foeniculum vulgare is native to southern Europe and is easily spread by birds and rodents consuming the seeds. There were only a few individual Foeniculum vulgare found along the perimeter of a fence with in the project site (Figure 2).

Foeniculum vulgare are competitive and since they establish in disturbed soils, they exclude native vegetation. This species is considered to have ranking of High Invasiveness by the Cal-IPC Inventory. Mechanical eradication is recommended by the Weed Report from the Weed Control in Natural Areas in the Western United States, stating that one should "[h] and chop small infestations. Slashing just before flowering may kill the plants, or repeat slashing of regrowth may be needed. Even if plants recover, slashing the stems at flowering will prevent seed set. The use of a mattock or remove the plant can also be successful."

The report goes on to include that "deep cultivation will also kill the plants but is not practical in most situations." Due to the low numbers of observed individuals, the likelihood of successful eradication is feasible is the follows the recommended methods for removal.

3.3.3 Scotch broom (Cytisus scoparius)

Cytisus scoparius (Figure 3) was found throughout the parcel at the perimeter of the forested openings along all the cultivation sites (Appendix B: Map 2). Cytisus scoparius is common throughout the western United States and favors grasslands, shurblands, oak woodlands, forest margins, coastal habitats, riparian corridors; disturbed sites such as roadsides, pasture, gravelly

floodplains, burned areas, cleared forests and is typically found in mountain regions and cool coastal areas with dry summers. It is a fast-growing deciduous shrub that can reach 5 to 10 ft tall. *Cytisus scoparius* forms dense stands that most wildlife finds impenetrable and unpalatable. These dense stems limit regeneration of most other plan species and the accumulation of woody biomass creates a dangerous fire hazard. This species is given the ranking of High Invasiveness by the Cal-PIC Inventory.

According to the Weed Report, from the *Weed Control in Natural Areas in the Western United States*, "[s]eedlings and small shrubs can be hand pulled. For larger established shrubs, a weed wrench or other woody weed extractor can be used. Extract the entire root or resprouting will occur." The report goes on the point out that the "[b]est results are achieved when soil is moist..." but the technician completing this mechanical control needs to be careful because "[d]isturbing the soil can stimulate the seedbank."

Given the abundant population of *Cytisus scoparius* it is recommended that the applicant focuses on the control of the individuals at the margins of the project site. The Weed Report points out that "[c]utting broom off before it flowers will reduce seed production and will deplete the plant's energy reserves..." and that "[r]sprouting is common after treatment, but can be reduced by cutting broom at the beginning of the dry season." It is recommended that the applicant follows these methods of control in order to keep the spread of *Cytisus scoparius* at bay.

3.3.4 Pennyroyal (Mentha pulegium)

Mentha pulegium (Figure 4) was found throughout the seasonal wet area identified at the downslope end of the preexisting cultivation Site 1 (Appendix B: Map 2). Mentha pulegium is common as an obligate wetland indicator species in seasonally inundated soils of valleys and bottomlands, usually below 1,640 feet elevation. Even though pennyroyal is considered uncommon in much of California, it occurs in the sierra foothills, Central Valley, and most coastal counties from the Mexican border to Oregon. Pennyroyal favors disturbed sites, seeps, stream sides, vernal pools, marches and ditches. This species is given the ranking of High Invasiveness by the Cal-PIC Moderate.

According to the Weed Report, from the *Weed Control in Natural Areas in the Western United States*, "[p]ennyroyal infestations can be suppressed by manual removal of individual plants and small patches before flowering... below-ground reproductive tissues should be severed approximately 3 inches below the soil surface when the plants are beginning to bolt."

The report goes on to explain that "[t]illage can be an effective control strategy for rosettes and bolting plants." However, since this species occurs within a potentially sensitive habitat (i.e. the seasonal wet area) it should be left alone, but observed to combat any potential spreading.

3.3.5 Common mullein (Verbascum thapsus)

Verbascum thapsus (Figure 3) was found in few numbers throughout the project site (Site 4) (Appendix B: Map 2). Verbascum thapsus can be found in open areas and prefers, but is not limited to, disturbed sites with well-drained soils. It is a short-lived perennial and can get up to 7 ft tall. This species originally came from Eurasia and can spread rapidly. Established stands are extremely difficult to control due to their abundance, long lived seed bank. This species is given the ranking of Limited Invasiveness by the Cal-PIC Inventory.

According to the Weed Report, from the Weed Control in Natural Areas in the Western United States, "[h]and pulling before seed set is an effective control method for mullein plants growing on loose soils. When digging, sever the root below the soil surface. Soil disturbance stimulates recruitment." It is also noted that "[t]illage is effective for controlling existing plants, but soil disturbance stimulates recruitment."

Given the scarce numbers of the plants observed, it is likely that *Verbascum thapsus* could be controlled. It is recommended that the applicant pulls the induvial plants out of the ground in spring before the seed matures and remove the vegetation from the site.

Section 4 Conclusion and Discussion

The applicant can control the spread of the invasive species previously listed if the recommended mitigation and control methods are followed. If the applicant follows the "early detection rapid response" approach before the plants can flower and seed, the current state of the cultivation area should be easily treatable. Due to the clustering of the invasive species observed within the agricultural field, and given that many of these species do not favor the surrounding forested habitat, the applicant can halt the invasion of these species spreading throughout the surrounding habitats if action is taken.

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Section 5 References

California Invasive Plant Council (Cal-IPC) Inventory: https://www.cal-ipc.org/plants/inventory/. Accessed December 2019.

Ordinance No. 2599, amending sections 314-55.4, 314-55.3.11.7, 314-55.3.7 and 314-55.3.15 of Chapter 4 of Division 1 of Title III of the County Code (CCLUP for Areas Outside the Coastal Zone). Board of Supervisors, County of Humboldt, State of California, May 2018. Accessed June 2019.

Weed Control in Natural Areas in the Western United States. UC Davis Weed Research and Information Center, 2013. Accessed December 2019.

Appendix A: Photos



Figure 1. Bull thistle (Cirsium vulgare) circled in red.



Figure 2. fennel (Foeniculum vulgare) circled in red.



Figure 3. Scotch broom (Cytisus scoparius) circled in red.

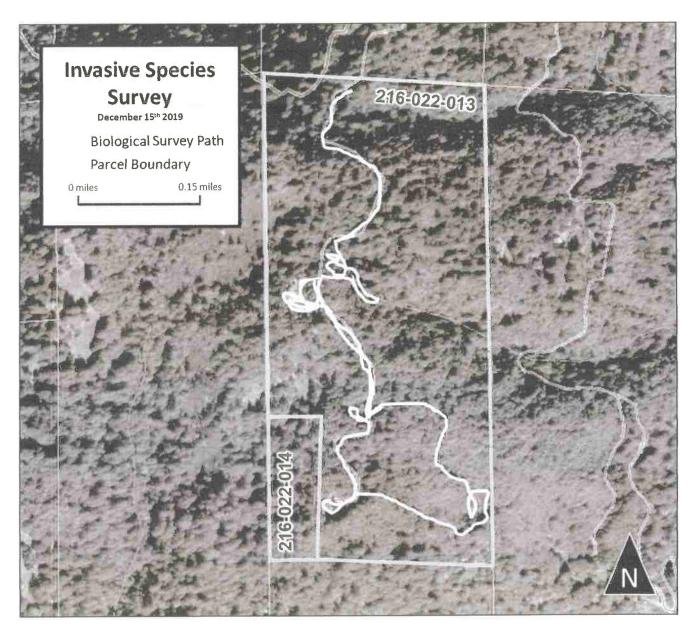


Figure 4. Pennyroyal (Mentha pulegium) circled in red.

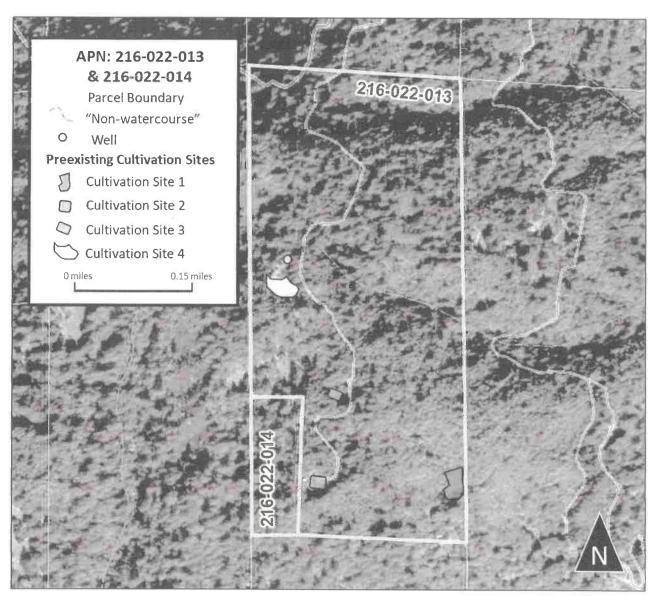


Figure 4. Common mullein (Verbascum thapsus) circled in red.

Appendix B: Maps



Map 1. Invasive Species Survey path conducted on December 15^{th} , 2019 on APN 216-022-013. (This is not a boundary survey, property lines shown here are approximated and taken from Humboldt County Web GIS)



Map 2. Map showing the preexisting cultivation site locations, as well is the proposed project site (Site 4), for reference for location of invasive species observed. (This is not a boundary survey, property lines shown here are approximated and taken from Humboldt County Web GIS)