

11016



*Operations Manual*  
*for*  
*Crisp Farms, LLC*  
*Cultivation Project*  
*Updated: 9/21/2019*

Produced By:

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<b>Project Name</b>	CRISP FARMS
<b>Project Location</b>	Willow Creek, CA
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<b>APN</b>	315-092-007
<b>Existing Zoning Designation</b>	AE; TPZ

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## Industry Analysis

Industry regulations have been enacted at the State, County, local and—in some instances—municipal levels. The proposed Project will adhere to all applicable regulations.

### Summary

A complex framework of regulatory laws influences cannabis cultivation regulations pertaining to the proposed Project, including Proposition 215, the Compassionate Use Act, Senate Bill 420, and the Medical Cannabis Regulation and Safety Act (MCRSA), and Proposition 65 (Prop 64) or the Adult Use Marijuana Act (AUMA), and most recently the Medical Adult Use Cannabis Regulation Safety Act (MAUCRSA).

Local permitting must be obtained before seeking licensure at the State level (which becomes effective January 2018). Some local jurisdictions in California, to date, have established and implemented regulations to permit, permit, and/or license cannabis business operations.

In November 2016, the AUMA legalized “recreational” cannabis possession, consumption, and personal indoor cultivation, but had no effect on medical marijuana permitting or licensing.

On June 27<sup>th</sup>, Senate Bill 94, otherwise known as, the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA) by Governor Jerry Brown in efforts to consolidate the two legislative pieces put in effect to govern commercial medical and recreational cannabis activities, otherwise known as the consolidation of the MCRSA and AUMA. The merge of these two legislative pieces features changes to the licensing scheme that we were working within prior to its effect.

### State Regulatory Framework

With the passage of the Compassionate Use Act (Proposition 215) in 1996 and the Medical Marijuana Program Act (MMPA) in 2003 (Senate Bill 420), California created a system of possession and cultivation limits, a voluntary identification program, and assurance of a non-diversionary system of medical cannabis cultivation and dispensation. The intent of these legislative efforts was to clarify the scope of application, prevent arrest and prosecution, promote uniform application, increase accessibility of product, and address issues within the act to promote fair and orderly implementation.

In September 2015, the California State legislature enacted three bills under the MCRSA, consisting of AB-243, AB-266, and SB-643. Each bill addresses various issues pertaining to licensing and regulatory requirements involving medical cannabis cultivation, manufacturing, transportation, distribution, sales, and testing. These bills became effectual January 1, 2016, with State licensing to open on January 1, 2018.

The MCRSA establishes a multiagency framework to regulate commercial cannabis. The foundation of MCRSA is: “No person shall engage in commercial cannabis activity without possessing both a State license and a local permit, license, or other authorization.” This legislation provides for the licensure of commercial cannabis activity in California, strengthens environmental protections, and creates licensing opportunities for small and specialty cultivators.

Assembly Bill 243 (AB-243) requires the CDFA, CDFW, and State Water Resources Control Board (SWRCB) to promulgate regulations and standards pertaining to medical cannabis cultivation efforts, mitigate impacts on environments, and coordinate enforcement efforts with State agencies.

Assembly Bill 266 (AB-266) addresses the licensure and regulation of medical marijuana for which the framework is primarily the responsibility of the Bureau of Cannabis Control (BCC) to enforce under the Department of Consumer Affairs' (DCA) and the Bureau of Medical Cannabis Regulation. Collaboratively, the Board of Equalization (BOE) and the CDFA are responsible for tracking and reporting the movement of cannabis goods throughout the State.

Senate Bill 643 (SB-643) addresses the setting of standards on behalf of physicians and surgeons prescribing medical cannabis and requires the Medical Board of California (MBC) to implement investigations of physicians who repeatedly or excessively prescribe medical cannabis to patients without good faith exemption. This bill requires the BMCR to gather fingerprints to conduct criminal history background checks.

This Act also grants the DCA sole authority to implement and govern the system for creation, issuance, renewal, discipline, suspension, or revocation of such licensure under the Bureau of Cannabis Control program. Additionally, the CDFA is responsible for administering provisions of the act related to or associated with cultivation and transportation of medical cannabis. This bill also authorizes counties and municipalities to propose and implement taxation on medical cannabis activity.

In addition to the initial framework developed to support local regulations and State licensing, there has been a broad legislative effort to institute clean-up bills to further clarify the scope and definitions under the MCRSA.

The Adult Use of Marijuana Act (AUMA), which passed in November 2016, has legalized adult use ("recreational") cannabis possession, consumption, and limited personal indoor cultivation. Because the AUMA legislation addresses only recreational cannabis issues, it currently has no effect on medical marijuana permitting or licensing.

On June 27<sup>th</sup>, Senate Bill 94, also known as, the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA) signed by, Governor Jerry Brown, in efforts to develop a single regulatory structure that governs commercial medical and recreational cannabis activities, collectively known as MCRSA and AUMA. The merge of these two legislative pieces features changes to the licensing scheme that were in effect prior to the implementation of MAUCRSA.

The creation of MAUCRSA prompted 23 license type activities varying from Cultivation, Processing, Manufacturing, Packaging, Infusion, Testing, Retail, Distribution, and Microbusiness licenses. License types 5-5B will not be available until 2023. Across the license types they will be assigned either an "A" for Adult Use or "M" for Medical operations. The introduction of new license types Type 5-5B Cultivation, Processing, Manufacturer I and II, Packaging, Infusion, and Microbusinesses was an introduction of license types carried from the AUMA. The MAUCRSA also now excludes transportation as a license type. Furthermore, clarification of the fact, points concerning that event licenses are not prohibited under this framework were also clarified. The local authority could issue event permits for "onsite cannabis sales to, and consumption by, persons 21 years of age or older at a County Fair or District Agricultural Association Event".

According to this legislation, an applicant may now pursue a State license without local approval, however, may not conduct activities until local approval is met, otherwise could prompt a violation that would make the State license applicant ineligible to hold the license.

### Local Regulatory Framework

Under State legislation, MCRSA, municipalities possess the authority to set their own regulations pertaining to land use and commercial cannabis business activities. Local permitting must be obtained before seeking licensure at the State level (which becomes effective January 2018).

#### Humboldt County

In October 2015, Humboldt County began its review process of the Commercial Medical Cannabis Land Use Ordinance (CMCLUO). This legislation governs commercial medical cannabis activities within the authority of the County of Humboldt and establishes zoning regulations, performance standards, and environmental compliance—as well as requiring proof of documentation. The ordinance went into effect February 26, 2016. The deadline for applicants was December 31, 2016.

On September 13, 2016 Humboldt County issued a correcting and clarifying document to address the elements of the CMCLUO that were not clear under the initial Ordinance No. 2544 and the implementation of the program.

An Environmental Impact Report is underway to assess the overall impacts of this program which could significantly affect the Commercial Cannabis Land Use Ordinance, once the results of the study have been considered.

## Executive Summary

Crisp Farms, LLC is a sole member Limited Liability Company formed in California whose purpose is to conduct agricultural activities within the State of California.

The Company has one (1) member-owner and up to twenty-five (25) staff members who will primarily support site activities during peak harvest. This model would set a healthy precedent for the Willow Creek community by setting a sound agricultural standard for this emerging industry.

The project applicant is seeking provisional permitting for one (1) existing cultivation area totaling 11,300 sq. ft. of outdoor cultivation. The applicant has applied for one (1) Medium Outdoor and one (1) Specialty Outdoor cultivation.

This project is not currently equipped with any existing infrastructure. All post processing activities are currently occurring on the adjacent -06 parcel. The project is proposing a commercial facility to support post processing activities, with an outdoor chemical storage shed. The project site features a proposed B&B facility with handwashing stations as well. The project site is equipped with generator power for minimal power needs.

The project site is equipped with two (2) rainwater catchment impoundments totaling 545,000 gallons, and three (3) diversions, and one (1) permitted well. Two (2) of the diversions located on the property are to support domestic use only at this time. The onsite permitted well is currently not equipped for use. The cultivation is supported by a rainwater catchment system in the Northeast portion of the parcel with capacity of 265,000 gallons. The rainwater impoundment located in the east central portion of the parcel supports the adjacent parcel ending in -06. The site is also equipped with an additional 16,950 gallons of water storage to support domestic/fire suppression/cultivation uses.

The project is under an existing agreement with California Department of Fish and Wildlife (CDFW) for stream crossings, existing ponds, and onsite diversions. This project was enrolled under the North Coast Regional Water Quality Control Board (NCRWQCB) and is currently enrolled under the State Water Resources Control Board (SWRCB). The project diversions are also registered through the Division of Water rights for domestic use.

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## Project Overview

The Project concerns Parcel No. 315-092-007 in Willow Creek, California that is seeking provisional permitting for outdoor medical commercial cannabis cultivation with consideration of the phased approach to development. The Project features cultivation areas totaling 11,300 sq. ft. Cultivation activities would occur on the Northern portion of the Parcel.

### Project Summary

The Project parcel is zoned TPZ, which falls within the allowable zoning specified by the local authority. The Sponsor seeks permit approval for 11,300 sq. ft. of outdoor cultivation that is pre-existing, is supported by evidence, and involves natural light only.

### Location Description

The proposed Project would occur on legal Parcel No. 315-092-007 in Willow Creek, CA, in the northwest, southwest and the southeast quarter of the northeast quarter and the northeast quarter of the southeast quarter of Section 14, Township 4 North, Range 4 East, Humboldt Meridian.

### Zoning

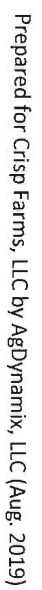
The property features zoning TPZ and the following characteristics:

- GIS acres: 163.83.
- Coastal Zone: Outside.
- 100 Year Flood Zone: Outside.
- Alquist-Priolo Fault Hazard Zone: Outside.
- FEMA FIRM Flood Rating & Panel Number: N/A
- Slope: <15% in cultivation areas.
- Relative Slope Stability (Per General Plan Geologic maps): High Instability.

### Soil Ratings

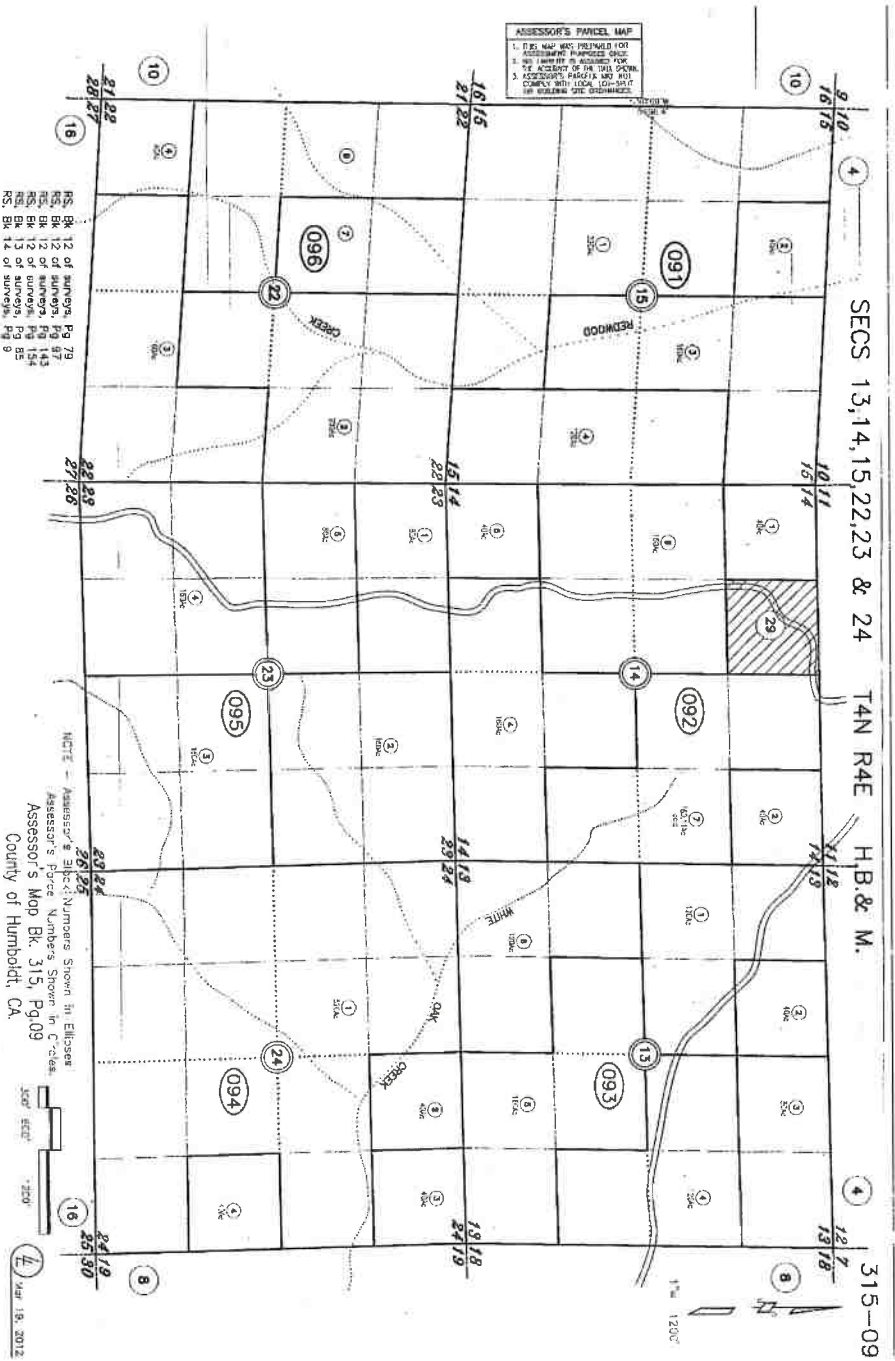
As per Humboldt County's Ordinance No. 2544, because the project is pre-existing, no prime agricultural soil rating requirement pertains.

## Overview Map



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# Assessor's Parcel Map



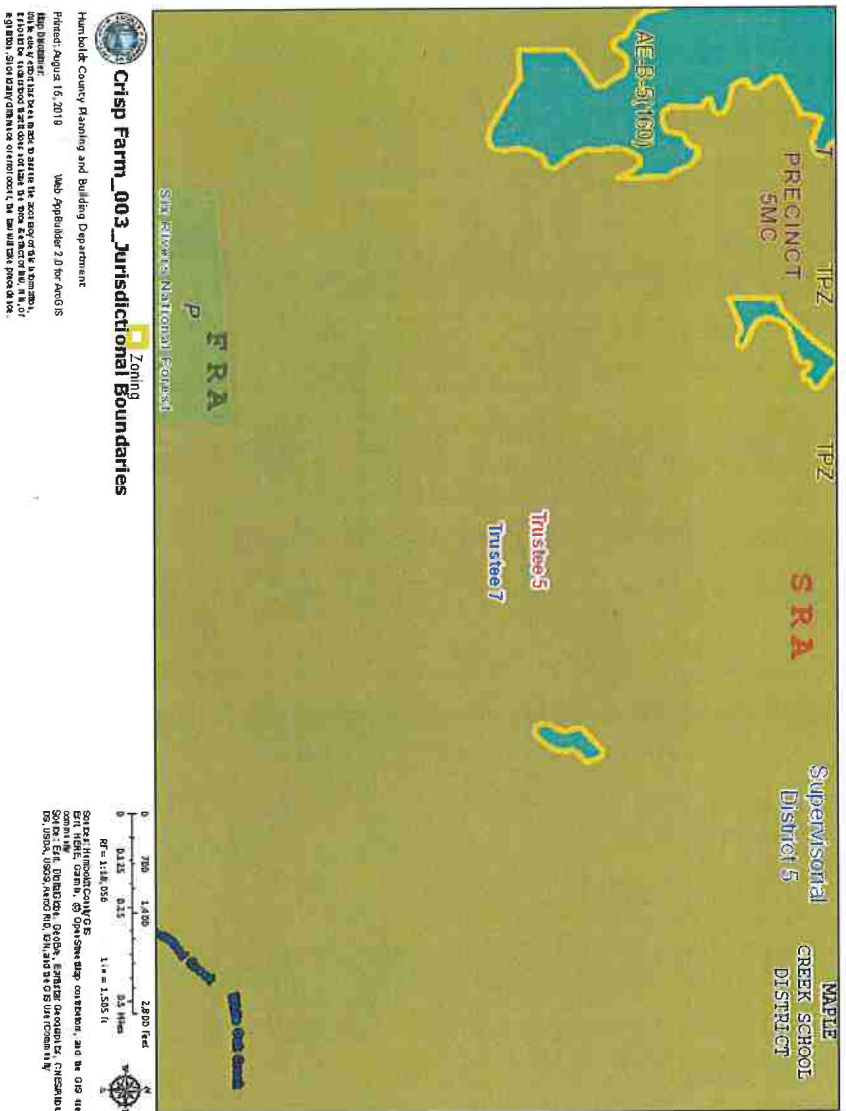
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## Zoning Map



## Jurisdictional Boundaries Map



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## Land Use (Critical Facilities) Map



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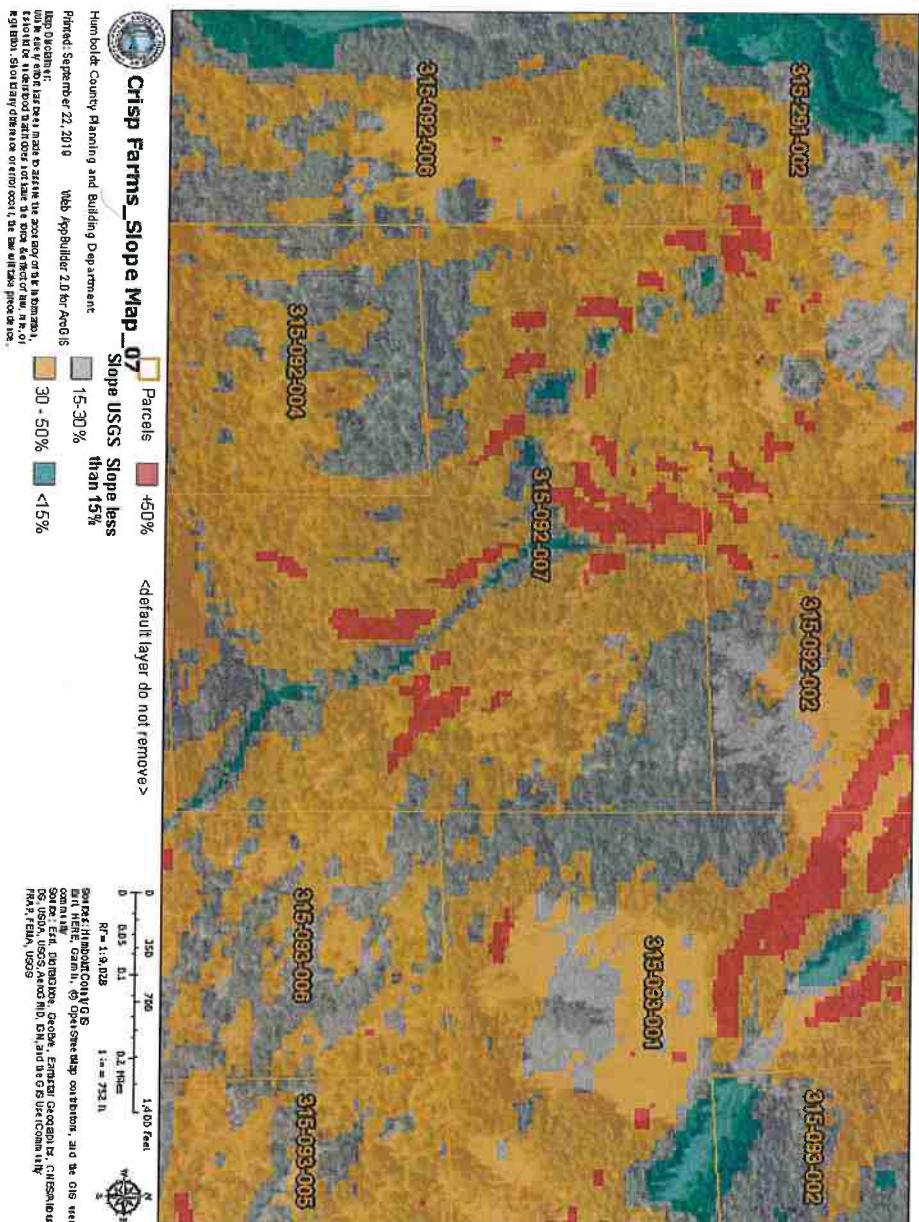
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# Slope Map

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## Environmental Impacts & Standards

Environmental impacts and standards include a comprehensive summary of all environmental elements related to the proposed Project. Impacts could include land use, development, pollutants, nuisances, and related environmental concerns. Federal and State standards have been set—with oversight from the United States Environmental Protection Agency (EPA) and the U.S. Department of Agriculture (USDA)—regarding potential environmental impacts caused by general industry applications.

Mitigation measures that can be employed for cultivation activities to prevent environmental detriment often feature the implementation of Best Management Practices (BMPs) suggested by the State Water Resources Control Board (SWRCB) under the Water Board Order and enrollment/compliance with the Waste Waiver Discharge (WWD) program through the North Coast Regional Water Quality Control Board (NCRWQCB). This can include the potential requirement for a Water Resource Protection Plan (WRPP). Additional conformance may be required with the California Department of Fish & Wildlife (CDFW) (formerly Fish & Game) under a Lake and Streambed Alteration Agreement (LSA-1600/1602).

All projects must also adhere to standards and maintain compliance with regulations set forth by the Division of Environmental Health (DEH) through a Contingency Plan (see *Contingency Plan* below) regarding all wastes (known as a Waste Management Plan). Applicants must also abide by regulations set forth by the Department of Pesticide Regulations (DPR) and the Tribal Historical Preservation Office (THPO) for archaeological preservation.

Often it is found, during the review of the Project, that there may be additional requirements and/or specific needs to support a sound environmental action or mitigative plan to adhere to the standards set under additional agency authority.

### Summary

Potential Project impacts could include biological resources, land use/planning, transportation/traffic, agriculture and forestry, hazards and hazardous materials, public services, utilities/service systems, geology/soils, and hydrology/water quality.

Development impacts could include those regarding landscapes, infrastructure, roadways, and other environmental ramifications resulting from the Project.

Nuisance mitigation would include prevention of environmental impacts such as through odors, lights, and sounds that could potentially adversely affect neighboring properties or habitats. The proposed Project area would be required to meet all setback standards required by all agencies within the State of California and the local authority.

### Background

On January 1, 1970, President Nixon signed the National Environmental Policy Act (NEPA). California Governor Reagan followed suit by signing the California Environmental Quality Act (CEQA) into law on September 18 of the same year. These laws required the incorporation of environmental values into governmental decision making. These statutes require Federal, State, and local agencies to analyze and disclose the potential environmental impacts of their decisions, and—in the case of CEQA—to minimize significant adverse effects to the extent feasible.

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NEPA was codified under Title 42 of United States Code § 4331 et seq. (42 U.S.C. 4331 et seq.). Under NEPA, Congress established the White House Council on Environmental Quality (CEQ) to ensure that Federal agencies meet their obligations under the Act. CEQ's Regulations for Implementing the Procedural Provisions of NEPA are found in Title 40 of the Code of Federal Regulations, § 1500 et seq. (40 CFR 1500 et seq.). In California, CEQA was codified under Division 13 of California's Public Resources Code (CPRC), section 21000 et. seq. (Cal. Pub. Res. Code § 21000 et seq.). The Guidelines for Implementation of the CEQA regulations are in Title 14 of the California's Code of Regulations (CCR), § 15000 et seq. (14 CCR § 1500 et seq.).

NEPA and CEQA are similar, both in intent and in their respective review processes (analysis, public engagement, and document preparation) that they dictate. Importantly, both statutes encourage a joint Federal and State review for projects that require both Federal and State approvals. In such cases, a joint review process can avoid redundancy, improve efficiency and interagency cooperation, and be easier for applicants and citizens to navigate. Despite the similarities between NEPA and CEQA, there are several differences that require careful coordination between the Federal and State agencies responsible for complying with the statutes. Conflict arising from those differences can create unnecessary delay, confusion, and legal vulnerability.

Federal, State, and local agencies have cooperated in the environmental review of projects ranging from infrastructural development to renewable energy permitting. As State and Federal governments continue to pursue shared goals, there will be a continued need for an efficient and transparent environmental review processes that meets the requirements of both statutes.

Recognizing the importance of implementing NEPA and CEQA efficiently and effectively, the CEQ and the California Governor's Office of Planning and Research (OPR) developed a handbook regarding conducting joint NEPA and CEQA review processes. The CEQ oversees Federal agency implementation of NEPA, which includes writing the CEQ NEPA regulations and preparing guidance and handbooks for Federal agencies.

OPR plays several roles in the administration of CEQA, including development of CEQA Guidelines in coordination with the California Natural Resources Agency, providing technical assistance to State and local agencies, and coordinating State-level review of CEQA documents. Agencies conducting an environmental review must also consider any additional requirements or deadlines established in the individual agency's administrative regulations or procedures that implement NEPA and CEQA. These requirements could prescribe additional or more stringent requirements than the CEQ regulations and CEQA guidelines.

The NEPA and CEQA handbook provides practitioners with an overview of the NEPA and CEQA processes and practical suggestions for developing a single environmental review process that can meet the requirements of both statutes. The handbook contains three main elements. First is a "Question and Answer" section that addresses the key similarities and differences between NEPA and CEQA. This section compares each law's requirements or common practices and identifies possible strategies for meeting the requirements of both laws. These strategies are not meant to prescribe methods that agencies must use; rather, the handbook provides suggestions that help agencies identify and analyze potential issues.

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### Project-Specific Factors

The following table details any potential effects to environmental elements related to the Project:

<input type="checkbox"/>	Aesthetics	<input checked="" type="checkbox"/>	Agriculture and Forestry	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Geology/Soils
<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Hydrology/Water Quality
<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Noise
<input type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Mandatory Findings of Significance

### Mandatory Compliance Factors

In accordance with the State of California, it is a requirement that agricultural operations obtain the appropriate environmental filings to support land alterations, diversions, and discharges of affluent.

#### Water Sources

This project features two (2) rainwater impoundment structures totaling 545,000 gallons for cultivation. Pond number one is designated for use on this parcel and pond number two is for the project ending in 06. This parcel has three (3) water diversions from an unnamed spring, one (1) of which is undeveloped and two (2) are developed for domestic use and fire suppression. This project is supported by a permitted back-up well, not currently in use, intend for cultivation and domestic use.

#### Statement of Water Diversion & Use (ISWDU)

Water Rights Certificates, D1077 & D1078.

#### Small Domestic Use Registration (SDU)

See above.

#### Small Irrigation Use (SIU)

Not Applicable.

#### Lake and Streambed Alteration Agreements (LSAA-1600/1602)

The project includes ten total encroachments. Three encroachments are for water diversion, two encroachments are for off-stream ponds with spillways, and five encroachments are for stream crossing locations. Four new stream crossing locations are proposed on a new road that will replace an over steepened existing road that is proposed to be abandoned. The work for these projects will include use and

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maintenance of the water diversion infrastructure. installation of four new crossings on Class II streams, maintenance of a rocked ford, and construction of the two ponds and spillways. All excavation related encroachments will be conducted using best management practices to minimize erosion and sediment delivery to streams.

#### Water Board Order: Waste Waiver Discharge (WWD)

Initial inspections by Timberland Resource Consultants (TRC) regarding water usage and discharges have been conducted. The initial notice of intent and monitoring/reporting forms, under the WWD, have been filed with the North Coast Regional Water Quality Control Board (NCRWQCB). A reporting/recording system would be developed, monitored, and reported to comply with annual renewal requirements under this order.

Additional inspections (post enrollment) would be conducted by TRC, with no current confirmation of when this inspection would occur. The proposed Project falls into Tier 2 due to the pre-existing cultivation site, canopy size, and water uses. The Project does not pose a notable threat to the environment due to several conditions that are documented in the WRPP.

The Project will comply under the State Water Resources Control Board (SWRCB) WQPP and the transition of enrollment has been facilitated.

#### Water Resource Protection Plan (WRPP)

A WRPP has been generated by the designated agency, TRC. This document is held by the third-party agent and applicant which maintained onsite to satisfy any request by the NCRWQCB. This ensures protection of nearby habitats via management of spoils, management of runoff/discharges, use of DPR-approved inputs, correct use of fertilizer, and proper storage of fungicides, pesticides, and fuels.

#### Site Management Plan (SMP)

A Site Management Plan is to be developed from pre-existing conditions on the property documented in the WRPP generated under the NCRWQCB Regional Water Board Order: Waste Waiver Discharge Program (WWD) and under recent documented activities that have been reported in the WQPP registration and SMP.

#### Department of Pesticide Regulation Requirements (DPR)

The Project would adhere to DPR requirements and limitations regarding pesticide, fungicide, and rodenticide inputs for cannabis cultivation and management of pests and/or disease. Quality and consumer-safe production requires medical cannabis cultivation inputs that are approved as environmentally sound and deemed safe for medical consumption.

#### Archaeological Inspections & Survey

There is no current archaeological inspection on file of which the permitting agent is aware, there is a study in progress currently. Records may also be accessible through Sonoma State University's Northwest Information Center (NWIC) and the local THPO.

#### Additional Compliance Factors

Bureau of Cannabis Control (BCC)

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In 2015, the Legislature passed, and the Governor signed into law three bills (Assembly Bills 243 and 266, and Senate Bill 643) that create a licensing and regulatory framework for medical cannabis through the Medical Cannabis Regulation and Safety Act. Later this was updated through the MAUCRSA, Senate Bill 94. This legislation created the Bureau Cannabis Control within the Department of Consumer Affairs. It also divided the responsibility for state licensing between three state entities – the CA Department of Food and Agriculture, the CA Department of Public Health, and the Bureau of Medical Cannabis Regulation, with the Bureau designated as the lead agency in regulating the cannabis industry in California. This agency is responsible for licensing concerning testing, retail, distribution, and microbusinesses.

#### CalCannabis Cultivation Licensing

As directed by the Medical Cannabis Regulation and Safety Act and the Adult Use of Marijuana Act, the California Department of Food and Agriculture (CDFA) has written the proposed regulations to establish cannabis cultivation and processing licensing and a track-and-trace system, collectively referred to as CalCannabis Cultivation Licensing.

#### Office of Manufactured Cannabis Safety

OMCS was established in the Center for Environmental Health of the California Department of Public Health (CDPH) after the Governor signed into law the Medical Cannabis Regulation and Safety Act in 2015. The Act established a licensing and regulatory framework for the manufacturing, packaging, and infusion of medical cannabis in California.

The Medical Cannabis Regulation and Safety Act created the Bureau of Medical Cannabis Regulation in the Department of Consumer Affairs, and tasked the following Departments to establish regulations for the medical cannabis industry:

**CA Department of Consumer Affairs (Bureau of Cannabis Control):** to license transporters, distributors, dispensaries, and testing laboratories.

**CA Department of Food and Agriculture (Cal-Cannabis Cultivation Licensing):** to license cultivators and will also be responsible for implementing the Track-and-Trace System for plants from cultivation to sale.

**CA Department of Public Health (Office of Manufactured Cannabis Safety):** to license manufacturers of cannabis.

## Performance Standards

Performance standards include nuisance mitigation (for noise, odors, light, and other potential hazards of the Project), setback requirements, and a consent to inspect.

### Setback Requirements

The proposed Project area meets all setbacks required by the local authority and adheres to all other setbacks from neighboring parcels and property boundaries.

Nearby parcel residences are more than 300' from the proposed cultivation space (applicable only to parcels of five (5) acres or less). There are no known schools, school bus stops, public parks, places of religious worship, or Tribal cultural resources that are known within 600' to 1,320' of the cultivation area. Additionally, a 30' setback from the PG&E pole and 12' of overhead lines and property borders is satisfied.

Setbacks from nearby waterways adhere to the NCRWQCB and the CDFW's setback requirements. It is deemed that Environmentally Sensitive Habitat areas will not be impacted by the proposed Project.

### Nuisance Mitigation

The Project would mitigate the potential for existing nuisances, including odors, lights, sounds, and other nuisances that extend beyond the boundaries of an adjacent property, with adherence to State and local (County and/or municipality) regulations pertinent to this Project.

Best mitigation efforts:

- Odor: Scrubbers.
- Light: Escape shielding.
- Sound: Buffering.

### Generator Use

Residential energy support is provided by a solar system, and infrequent generator use occurs to support drying activities.

### Consent to Inspect

This section hereby grants to the relevant authority an authorization to conduct an annual compliance inspection with a minimum notice of 24 hours. The inspection would be conducted by officials during regular business hours (Monday-Friday, 9:00 am-5:00 pm), excluding holidays.

## Cultivation Plan

The Cultivation Plan adheres to robust standards promulgated under the DPR and regulated under the CDFA, and in accordance with DCA's consumer standards maintained by the Department of Public Health (DPH).

In preparation for future certification related to organically produced product, the Cultivation Plan also follows National Organic Program (NOP) standards. The input guidelines established by the DPR are in accordance with certification regarding organically produced product requirements and follow a whole-farm BMP plan for management of land, crops, and end products.

### Summary

The Project proposes 11,300 sq. ft. of pre-existing outdoor cultivation in the form of one (1) outdoor areas on approximately 168.83 acres of TPZ zoning that would be serviced entirely by natural light with exception of supplemental lighting to support nursery activities.

### Cultivation Schedule

The following table details the annual cultivation schedule, comprised of one (1) harvests per year, with breakdown by area. Water figures are indicated in gallons.

Area	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Outdoor	-	-	Veg	Veg	Veg/Blm	Blm	Blm	Blm	Blm	Blm/Hrv	-	-
Water	-	-	1000	1000	5000	10000	10000	10000	10000	10000	-	-

\*Water use as reported in the self-reporting attachment 2017 Appendix C or Monitoring & Reporting Form (MRP) of the WWD Enrollment divided by 2 (The enrollment reports total pond use for two parcels).

### Winterization Plan

During the fallow months, exposed ground would be cropped with green cover and native vegetation seed to protect against erosion and denitrification of the soil. Green manures would be incorporated into the native soils to enhance productivity during the forthcoming planting season.

## Water Resources

To mitigate runoff from cultivation activities, high-retention soil mediums and special irrigation techniques would be employed.

### Irrigation Plan

For most of the season, crop production would be directly irrigated from the rainwater catchment impoundment. Applicant employs water reduction and dripline irrigation methods.

### Irrigation System

Applicant is using a dripline irrigation system to reduce irrigation demands to support the cultivation activities.

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Dripline System:

2" Mainline

1" Inline

½" Spacing of Drip ring designated to each plant

#### [Emergency Water Plan](#)

In the event of a water emergency, the proposed Project currently features adequate water storage to supply the Parcel.

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## Operational Plan

The Operational Plan covers many aspects of the business, including location, organization, and a description of the Project's business sponsor that includes its mission, vision, and values. It also includes a description of what is produced by the Project, including sales and marketing efforts.

### Summary

The Operational Plan details use of the organization's resources in pursuit of the strategic plan. It prescribes specific activities and events to be undertaken to implement strategies. It is a plan for the day-to-day management of the organization (encompassing a one-year period). An operational plan should not be formulated without reference to a strategic plan. Operational plans may evolve from year to year with business growth. The chief executive, lead staff, and third parties of or for the organization often produce the Operational Plan.

The products produced by the Project would have the primary designated use of the treatment of patients with varying ailments. Medical cannabis products would be distributed to qualified medical cannabis consumers via wholesale outlets and retail dispensary locations.

## Business Organization

Crisp Farms LLC is a sole member Limited Liability Company (LLC) operating under entity number 201616810121 that features one member-manager. This member-manager is responsible for delegating primary activities pertinent to the organization's daily and future management.

### Management Team

Dean Crisp, Chief Executive Officer

## Business Description

The primary goal of Crisp Farms is, within the State of California, to conduct agricultural activities and produce specialty agricultural products.

### Mission

Crisp Farms is a for-profit entity with the mission of producing high-grade specialty cannabis agricultural products to support the medical cannabis supply chain for California-based retail dispensary outlets.

### Vision

Crisp Farms adheres to a sustainable and homestead-driven, integrative farming model that includes standards related to organically produced crops and onsite agricultural resource sustenance. The company's model integrates sustainable living and production principles with cannabis cultivation.

### Values

Crisp Farms values the need for prudent land management strategy, social equity, and the quality production of cannabis to supply medical consumers and the treatment of their conditions. The company is committed to operating within full compliance of local, County, and State regulations.

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## Products

Crisp Farms would produce specialty agricultural cannabis and nursery stock to support the onsite cultivation of high-grade organically produced cannabis flower products that are tested and assured for quality. Cultivation byproducts of additional value would be sold to permitted manufacturers (for the processing of extracts, concentrates, and topical products).

The primary designated use of the raw medical cannabis (flower) produced would be the treatment of patients with varying ailments. Premium-grade medical cannabis can be consumed via multiple methods, including inhalation, ingestion, and dermal (topical) applications. Cannabis has proven to deliver positive efficacy for myriad ailments, conditions, and symptoms. Research is underway regarding additional benefits of medical cannabis.

## Sales & Marketing

Crisp Farms' product would be distributed to medical cannabis consumers via wholesale outlets and retail dispensary locations and ancillary marketplaces. The quality, testing thresholds, and branding would target consumers who lead a Lifestyle of Health and Sustainability (LOHAS) and who prefer premium organically produced medicine.

## Chain of Custody

Crisp Farms adheres to a robust system of chain of custody for recordkeeping and sourcing potential contamination of seed/nursery product, flower product, trim, or value-added byproducts. This system would serve to verify responsibility for and liability of products during cultivation, processing, distribution, and wholesale/retail sales.

## Packaging

After testing and processing, products would be packaged per quality control standards and in tamper-proof packaging that does not appeal to minors. Products packaged in larger volumes would be distributed directly to consumers and retail outlets. Individual consumer labelling may be applied at the distributor or retailer level, after transfer of ownership in the chain of custody. If the business chooses to protect its branding through the Agricultural Commissioner, products would be individually packaged and labelled within the County of origin.

## Distribution

Crisp Farms will secure trading outlets for its products through existing local distribution networks. These distribution networks service retail dispensary outlets that seek licensure within their respective jurisdictions, as well as the State licensing platform under the CDFA. The established patient base has created a demand and fulfills the need for many medical cannabis products from multiple licensed suppliers within the State of California.

### Track and Trace Standards

As per the Track and Trace provisions as of June 27<sup>th</sup>, 2017 under the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA), Senate Bill 94.

#### Chapter 6.5. Unique Identifiers and Track and Trace

26067. (a) The department, in consultation with the bureau, shall establish a track and trace program for reporting the movement of cannabis and cannabis products throughout the distribution chain that utilizes a unique identifier pursuant to Section 26069, secure packaging, and can provide information that captures, at a minimum, all the following:

(1) The licensee receiving the product.

(2) The transaction dates.

(3) The cultivator from which the product originates, including the associated unique identifier pursuant to Section 26069.

(b) (1) The department, in consultation with the State Board of Equalization, shall create an electronic database containing the electronic shipping manifests to facilitate the administration of the track and trace program, which shall include, but not be limited to, the following information:

(A) The variety and quantity or weight of products shipped.

(B) The estimated times of departure and arrival.

(C) The variety and quantity or weight of products received.

(D) The actual time of departure and arrival.

(E) A categorization of the product.

(F) The license number and the unique identifier pursuant to Section 26069 issued by the licensing authority for all licensees involved in the shipping process, including, but not limited to, cultivators, manufacturers, distributors, and dispensaries.

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## Transportation

All products would be transported through either the permitted cultivator to processing or distribution and/or via a licensed transporter to trading partners that are authorized to distribute cannabis products to end consumer outlets (when applicable). These transporters would be responsible for adhering to guidelines that involve (but are not limited to) permitting, weights and measures, packaging/packing/labeling, verification of packing and freight volumes, and liability insurance that covers product loss resulting from unintentional diversion or emergency.

Transporters would be responsible for fulfilling contractual deadlines and ensuring delivery of products in a timely fashion to maintain positive standing with trading partners and protect the quality of a product that features a limited shelf life.

SB-643, Chapter 719, § 19302.1 (d): “The DCA shall have the sole authority to create, issue, renew, discipline, suspend, or revoke licenses for the transportation, storage unrelated to manufacturing activities, distribution, and sale of medical marijuana within the State and to collect fees regarding activities the BMCR regulates. The bureau may create licenses in addition to those identified in this chapter that the bureau deems necessary to effectuate its duties under this chapter.”

## Processing Plan

The Processing Plan covers many aspects of the end stage cultivation workflow employed by the business to harvest, dry, trim, cure, package, and assure the quality of medical cannabis products. Quality assurance efforts include sanitation, dust control, and environmental standards necessary for optimal processing.

### Background

#### Summary

As promulgated under various regulatory agencies, including but not limited to the Labor Commissioner (LC) and Wage and Hour Division (WHD), Employment Development Department (EDD), the Agricultural Labor Relations Board (ALRB), United States Department of Agriculture (USDA), the Food and Drug Administration (FDA), California Department of Food and Agriculture (CDFA), and are responsible for varying aspects of government labor laws, quality control, minimum wage and hours laws, administrative responsibilities, and health and safety regulations that govern processing and day labor activities related to Agricultural industries.

### Project Details

Cultivation activities undergo a common process flow that involves cultivation, to harvest, drying, to testing, grading/sorting, curing, to testing, packaging, to testing again (distributor level), and end sales. This is in efforts to ensure robust quality control; the business would employ stringent grading and sorting of medical cannabis product during harvest to eliminate any contaminated product from end supply.

#### Project Processing Environment

Processing environment is a proposed 20' x 30' commercially permitted structure and would support post-harvest activities.

### Administrative

Administrative elements of the Project include payroll, recording and reporting, chain of custody, safety procedures and protocols, product safety materials, labor and subcontractor issues, and quality assurance/control of product.

#### Labor Management

The primary organization currently responsible for the recordkeeping of employees (both seasonal and permanent) would be Crisp Farms. All records maintained by Crisp Farms would be made available upon request.

The organization has considered payroll options for peak times of the season during which employment periods would be up to several months in duration (particularly during the harvesting, processing, and packaging stages of cultivation). An outside entity may be responsible for soliciting, recruiting, and hiring employees.

The designated entity is responsible for ensuring property, business, and workplace compliance under the guidelines of the following departments:

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- Bureau of Medical Marijuana Regulation (BMCR).
- California Department of Food & Agriculture (CDFA).
- County Agriculture Commissioner (CAC).
- County Planning Department (CPD)/Community Planning (CP)/Development Department (DD).
- Department of Industrial Relations (DIR).
- Department of Labor, Wage, and Hour Division (DL-WHD).
- Department of Pesticide Regulation (DPR).
- National & California Agricultural Labor Relations Board (NALRB/CALRB).
- Occupational Safety and Health Administration (OSHA).
- U.S. Department of Labor (US-DOL).

### Recording & Reporting

All employee records for hours worked and reported would be kept onsite or via a payroll recordkeeping center and submitted to the managing payroll department to ensure timely reporting. Requests for review of payroll records would be the sole responsibility of the managing human resources agent (upon request and under certain lawful circumstances).

### Quality Assurance & Control of Product

Quality assurance efforts encompass sanitation, climate control, dust control, and a variety of environmental standards. Quality control measures include monitoring, testing, harvesting, drying, curing, grading, sorting, packaging, secure storage, and distribution procedures.

In 2011, the Food and Drug Administration tasked the U.S. Department of Agriculture (USDA) to co-create with the U.S. Department of Health and Human Services (USDHHS) and the Center for Food Safety and Applied Nutrition (CFSAN) a program to implement Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs). The goal was to mitigate food safety hazards and set standards and management regulations for processing facilities to ensure quality and consumer safety of agricultural products when handled in processing environments.

Found in the April 2011 *Guide to Minimize Microbial Food and Safety Hazards for Fresh Fruit and Vegetables* (authored by the USDA, USDHHS, and CFSAN) is discussion about the fundamental procedures that should be developed and implemented. This document features a list of principles applied to the workplace in efforts to meet these standards and is as follows:

- Accountability for product quality.
- Controls for workplace sanitation.
- Employee hygiene.
- Minimization of microbial exposures.
- Operating procedures.
- Packaging procedures and protocols.

### Chain of Custody

Agricultural businesses must adhere to a rigorous chain of custody system for product management and the identification of contamination in all raw and finished products.

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### Monitoring

Pre/post-harvest workflow would be monitored on a predetermined schedule and involve documentation of the condition of the product during its active stage of monitoring.

### Harvesting

During harvest, a labor crew would be required to assist with light physical labor, including walking, crouching, lifting, and some climbing.

### Testing Procedure

All product testing would be conducted by an approved (certified) third-party laboratory. This would encompass testing for potency and purity, including the presence of pesticides, fungicides, and harmful micro biologics.

### Drying/Curing

Product would be harvested at maturity and dried and cured in a climate-controlled environment. The primary equipment used would include dehumidifiers, fans, and heaters.

### Grading/Sorting

Products would be graded based on testing results, maturity, and specific intended use (flower, manufacturing of extracts, concentrates, topical products, etc.)

### Processing

Product would be harvested, trimmed, dried, and cured in a manner best suited to the specific environmental factors of the crop. This would include both visual inspections by master cultivators and data collection and analysis (via automated sensors).

### Packaging

Packaging would adhere to the guidelines for package type, quantity/weights, warning labels, and stamping procedures.

### Health & Safety

The first response emergency contact phone number is 9-1-1. Hospitals are Mad River Community Hospital at 707-822-3621 (Arcata) and St. Joseph Hospital at 707-445-8121 (Eureka). The American Association of Poison Control Centers (AAPCC) can be reached at 800-222-1222.

### Job Hazard Analysis

Labor duties would vary throughout the harvesting, drying, processing, and packaging stages of the operation. With each task, an analysis would be conducted to identify potential hazards associated with a task, including weather conditions, the physical aptitude of employees, tools utilized, and potential exposure to chemicals and other substances. Identification of these hazards is intended to mitigate potential job hazards and help ensure employee adherence to safety practices.

### Injury Illness Prevention Plan

It is required by the DIR that every employer shall establish, implement, and maintain an effective Injury and Illness Prevention Plan (IIPP).

Components of an IIPP include:

- Employee compliance with safe and healthy work practices.
- Investigation of injuries and/or illnesses.
- Procedures for correction of unsafe/unhealthy conditions, work practices, and/or procedures.
- Procedures to identify and evaluate workplace hazards.
- Responsible person(s) and contact information.
- Safety training.
- System for communication with employees.
- Thorough safety program recordkeeping and document retention practices.

### Heat Illness Prevention Plan

Written protocols regarding heat illness prevention would be available to employers, managers, supervisors, and employees regarding how to prevent and handle heat illness incidents.

To prevent heat illness to employees in the field, several factors must be considered:

- Ambient temperature (measured via thermometer or weather report).
- Crew size.
- Excessive clothing.
- Other relevant exposures.
- Presence of personal protective equipment or additional sources of heat.
- Work shift duration.

The following heat illness factors would be considered:

- Accessibility of drinking water.
- Accessibility of shade (via protective structures).
- Periodic rest breaks.
- Reminders to employees to remain hydrated.

### Hazard Communication Policies

Hazard communication is important to ensure the safety of all onsite employees, contractors, and subcontractors. Potential and known hazards would be made clear prior to conducting tasks and activities. Implementing this procedure is important to ensure that employees, contractors, and subcontractors are informed about the relevant risks associated with certain onsite tasks and the reduction of liabilities against the employer for improper use of equipment, machinery, and tools.

### Emergency Procedures

Emergency procedures include the availability of eye washing stations and detailed procedures for dealing with chemical spills. In the event of an emergency, certain protocols would be developed and followed regarding fire evacuation plans, earthquake safety, and other emergency scenarios.

### Chemical Handling

Any input products used onsite would be accompanied by MSDS and Chemical Inventory Lists that would be available to inspectors and employees and maintained onsite.

In the event of emergency spills, Call 9-1-1 and then report to the Office of Environmental Safety (OES) and California State Warning Center (CSWC) at 800-852-7550 or 916-845-8911 and identify proper steps to isolate the incident and cleanup.

### Eye Washing Station

Often, chemicals used onsite provide MSDS sheets that indicate the need for applicators to utilize an eye washing station after exposure. The eye washing station must be positioned within 200' of the cultivation area and any areas where chemicals, fertilizers, or pesticides would be used or administered for various applications.

### Employee Accident Policies

An investigation would be conducted to determine next steps.

The company adheres to protocols for employee accident reporting. The manager is responsible for documenting any onsite incidents using *Form 5020*, including:

- Address of accident/event site.
- Description of accident/event and if the accident scene/instrumentation has been altered.
- Employer's name, address, and telephone number.
- Law enforcement agencies present at the accident/event site.
- Location of medical treatment.
- Name and address of injured employee(s).
- Name and job title of reporting party.
- Name of contact person at accident/event site.
- Nature of injuries.
- Time and date of accident/event.

Accidents need to be reported immediately to Cal/OSHA in Redding at 530-224-4743.

Contact the business' medical provider, the employee's designated medical provider, or 9-1-1, depending on the severity of the incident. Follow up with contact to the California Division of Workers' Compensation (CDWC).

### Personal Protective Equipment Policies

Application of pesticides and fungicides requires personal protective equipment, including respirators, Tyvek suits, and gloves. It is the applicator's responsibility to ensure safety in the field. The farm manager

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is responsible for furnishing, applying, and informing of the appropriate uses associated with such products.

Applicators are required to acquire an Operator ID through the Agriculture Commissioner via the Pesticide Handling Training Program (PHTP). This would involve training applicators about labels, cautions, and recommended Personal Protective Equipment (PPE). Pesticide PPE would be stored onsite and separately from fertilizers, pesticides, and fungicides. Restricted Entry Intervals (REI) would be imposed and posted after application of chemicals to prevent exposures.

Additional PPE provided onsite for any processing labor would include access to gloves and dust masks by employees during drying, processing, and packaging.

It is the responsibility of managers/supervisors to ensure that PPE policies are followed during appropriate working conditions. In the event of product application by an employee, the applicator must be designated an operator ID and is required to employ the proper PPE during application, as well as abide by label warnings in the event of exposure, poisoning, or a spill.

Processors may be required by State law to employ PPE equipment for the duration of their shifts to ensure no exposure to and/or contamination from a product.

All laborers must be made aware of REI and tangible notification of the recommended REI after the application of pesticides, fungicides, and other chemical applications.

### Occupancy & Structural Guidelines

The general environments in which laborers would work include the field and within the proposed processing building. The environments in which any agricultural activity would occur would follow all guidelines (per agricultural and labor oversight agencies). The facility would need to meet commercial building standards in accordance with California Building Codes and would be made compliant with the American with Disabilities Act (ADA) and Architectural Barriers Act (ABA).

Any housings, buildings, and structures would be subject to California Building Code (CBC), including possible permitting requirements, inspections, and certificate(s) of occupancy. Additionally, specific exemptions exist that pertain to agricultural standards under the Occupational Safety and Health Administration (OSHA) and in conformance with the Occupational Safety and Health Guidelines (OSHG) (unless the Project meets certain exemptions, such as being a family-owned and operated business, does not offer temporary labor housing, or employs fewer than 10 employees at any given time). In other such cases, the site would need to comply with OSHA Guidelines pertaining to agricultural employment.

### Notification of Occupancy & Terms

As per the DIR and the US-DOL, all notices and labor postings would be provided and visible to all onsite employees. Any notification of occupancy status and terms of employee occupancy would be posted in compliance with all local, State, and Federal laws governing agricultural employers under the following regulatory bodies and regulations:

- California Agricultural Labor Relations Act (CALRA).
- California Occupational Safety & Health Administration (Cal/OSHA).

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- Department of Industrial Relations (DIR).
- State and National Agricultural Labor Relations Board (CLRB & NLRB).
- U.S. Department of Labor (US-DOL).

#### Maintenance of Sanitary Facility

To help ensure the quality of finished product, a clean working environment would be maintained during the drying, curing, processing, and packaging stages of cultivation. Among other benefits, this would prevent potential contamination between crop batches. All product would be batch tested prior to processing. In the event of a recall, it would be assured that each batch or variety has not become contaminated during these stages within the processing facility.

#### Dust Control Measures

In the event of high dust levels, all processing environments would maintain clean working areas to prevent potential dust exposure to employees.

To ensure product quality and to prevent potential contamination of processing environments, certain dust control measures would be implemented. These measures would include maintenance of sanitary working environments and possible implementation of air filtration systems.

#### Water Access & Facilities

The Project site would provide employees with access to the following facilities/resources within reasonable proximity to work areas:

- Handwashing facilities (field area).
- Onsite potable water (work areas).
- Restroom facilities (field area).

## Contingency Plan

In accordance with specifications provided by the DEH and the California Unified Program Act (CUPA)—to meet the business plan criteria required to ensure compliance with regulations that are intended to protect public health and the environment—this section addresses water production (including well construction) and the handling of onsite wastewater, solid waste, and hazardous materials.

### Summary

The Contingency Plan addresses onsite wastewater and hazardous wastes, solid waste removal and recycling, water production and well construction, hazardous materials handling, agricultural product storage, and chemical spill procedures and handling guidelines.

Material Safety Data Sheets (MSDS) for all fertilizers, soil amendments, and pesticides would be made available onsite. If requested, all equipment maintenance performed onsite would be listed/described. Per California Department of Food and Agriculture (CDFA) regulations, chemicals would be stored separately from fuels, oils, and similar products. Fertilizers and pesticides, specifically, would be stored in locked containment within an outdoor structure.

Chemical spills would be handled and reported per directions in the Project's Chemical Spill Procedure.

Common waste products that would be used or generated onsite include:

- Fertilizers.
- Fuels.
- Household chemicals.
- Human refuse.
- Human waste.
- Pesticides/herbicides/fungicides.

To ensure mitigation of potential pollution of grounds, nearby waterways, and ecological habitats, the proper treatment, storage, removal, and overall security of potentially polluting products would be ensured via use of dedicated areas and containers that are covered and watertight.

## Project Waste Management

The sections below address the Project-specific details, impacts, and procedures for handling waste products.

### Project Specific Details

Auxiliary agricultural structures support the site. The Project site is supported by supplemental generator use. The Sponsor has identified that the operation requires up to twenty-five (25) employees during peak staffing to perform seasonal work activities. It is estimated that peak staffing would occur for a duration of approximately four (4) to six (6) weeks (cumulative) throughout the active working parts of the season.

### Onsite Wastewater/Hazardous Wastes

The proposed Project location proposes to equip the Project site with a septic system that would be plumbed to the processing structure. Portable toilet facilities will also be available to field work areas. Employees would utilize both systems for primary uses. Now, no record of permit or data exists regarding age or specifications of the system. Further inspections may be required to identify the septic system's ability to support increased use during peak seasonal work times and whether it requires an upgrade to meet commercial standards.

### Waste Management Standards

As per the CCR, Title 8, § 3457, which addresses field sanitation standards, the cultivation site is required to provide access to waste facilities within one-quarter (1/4) mile or a five (5) minute walk, whichever is shorter.

If the primary septic system is not within this accessibility threshold, a portable facility or pit privy may be provided in lieu of septic to support waste activities. The standards for portable waste facilities are as follow:

- Toilet facilities: Shall be always operational, maintained in a clean and sanitary condition, and kept in good repair. Records of service and maintenance shall be retained for two years.
- Chemical toilet wastewater tank: Shall be constructed of durable, easily cleanable material and have a minimum tank capacity of forty (40) gallons. Construction shall prevent splashing on the occupant, field, or road.
- Chemical tanks: Contents shall be disposed of by draining or pumping into a sanitary sewer, an approved septic tank of sufficient capacity, a suitably sized and constructed holding tank approved by the local health department, or any other method approved by the local health department.
- Privies: Shall be moved to a new site or taken out of service when the pit is filled within two (2) feet of the adjacent ground surface. When the privy is moved, the pit contents will be covered with at least two (2) feet of well-compacted dirt.

### Hazardous Materials Handling

The Project is supported by solar and supplemental generator use and will require a small amount of fuels to supply the energy needs of the cultivation drying activities. Other fuels may be used for small equipment and machinery and may include gasoline, oils, and diesel. All fuels used for equipment would be stored per the (CUPA) fuel and chemical storage guidelines.

To meet environmental health standards, applicants must maintain a list of and describe all compressed gases, cleaners, and sanitizers (including, but not limited to, household chemicals, bleach, and alcohol) and document quantities stored onsite. Fuels, pesticides, and other agricultural/household chemicals are required to be stored in locked containment, separate from other input products. Any substance in use shall be accompanied by a posted notification that clearly identifies its nature. To prevent spills onto ground surfaces, any motors, fuel containers, etc. would be stored in drop pans and within an enclosed area.

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### Hazardous Material Standards

Quantities that trigger disclosure are based on the maximum amount onsite at any one time, as follows:

- 55 gallons, 500 pounds, or 200 cubic feet (for 30 days or more at any time during a year).
- Any amount of hazardous waste.
- Category I or II pesticides.
- Explosives.
- Extremely hazardous substances (above the planning threshold).

MSDS for all fertilizers, soil amendments, and pesticides (including organically produced examples) would be furnished and made available onsite. Compressed gases, cleaners, and sanitizers are stored on the premises in the quantities outlined in the *Gases and Cleaners* inventory list that is maintained onsite.

Applicants are required under CUPA guidelines to list/describe all equipment maintenance performed onsite (including changing oil, antifreeze, etc.). Upon request, applicant will furnish information regarding ongoing maintenance of small machinery and equipment that is necessary to support cultivation activities.

### Project Equipment Inventory

Tools for this project are stored on APN 315-093-006

### Maintenance

Equipment will be maintained off site.

### Project Product Inventory

Stored on APN 315-093-006

### Fuels/Oils stored in fuel storage

Stored on APN 315-093-006

### Fertilizers/Pesticides/Fungicides/Rodenticides

(Stored in metal container on APN 315-093-006)

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| • Monterey Garden Phos-5 gal         | • Karbo boost – 5 gal            |
| • Heavy 16 Veg A – 200 gal           | • Ph- -2 gal                     |
| • Heavy 16 Veg B – 200 gal           | • Ph+ - 2 gal                    |
| • Plant Therapy – 5 gal              | • Plus C -2.5                    |
| • Earth Juice – 20 lbs.              | • Bison soil molasses – 25 lbs.  |
| • Vit. B1 – 1 gal                    | • Rainbow mix grow – 500 lbs.    |
| • Mykos 50 lbs.                      | • Chicken super green – 200 lbs. |
| • Earth Juice Bloom Master – 20 lbs. |                                  |
| • Magnesium dextro-lac – 2.5 lbs.    |                                  |
| • Earth juice hi brix – 5 gal        |                                  |

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### Agricultural Product Storage

As per the DPR (enforced by CDFA or the local Agriculture Commissioner), Projects that utilize pesticides and fertilizers must meet guidelines pursuant to CCR, § 6670, Title 3, Division 6, *Pesticide, and Pesticide Control Operations*. General guidelines dictate that chemicals are to be stored separately from fuels, oils, and similar products. Fertilizers and pesticides would be stored in locked containment within an enclosed outdoor structure.

### Chemical Spill Procedure/Handling

In the event of emergency spills, the incident would be reported to the Cal OES State Warning Center at 800-852-7550 or 916-845-8911. The California Highway Patrol must be notified via 9-1-1 of spills occurring on highways in the State. The *Chemical Spill Procedure* would be followed and emergency services also contacted via 9-1-1. The procedure would follow the California Office of Emergency Services (Cal OES) *California Hazardous Materials Spill/Release Notification Guidance* (February 2014) and the (EPA) (Pacific Southwest, Region 9) *Chemical Spills Prevention and Preparedness* webpage.

In the State of California, many statutes require emergency notification of a hazardous chemical release, including:

- California Labor Code § 6409.1 (b).
- Government Code § 51018, 8670.25.5 (a).
- Health and Safety Code § 25270.8, § 25510.
- Public Utilities Code § 7673 (General Orders #22-B, 161).
- Title 42, U.S. Code § 9603, 11004.
- Vehicle Code § 23112.5.
- Water Code § 13271, § 13272.

In addition to statutes, several agencies have notification or reporting regulations:

- Title 8, CCR, § 342.
- Title 13, CCR, § 1166.
- Title 14, CCR, § 1722 (h).
- Title 17, CCR, § 30295.
- Title 19, CCR, § 2703, 2705.
- Title 22, CCR, § 66265.56 (j), § 66265.196 (e).
- Title 23, CCR, § 2230, 2250, 2251, 2260.
- Title 40, CFR, § 263 esp. § 263.30.
- Title 49, CFR, § 171.16.

### Solid Waste Removal/Recycling

All garbage will be contained within a holding structure on APN 315-093-006 and is to be removed no less than once per week. All waste and/or recycling materials will be processed by a permitted solid waste/recycling facility. The facility designated to receive waste products for this project is Humboldt Sanitation & Recycling 2585 Central Ave, McKinleyville, CA 95519.

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#### Water Production/Well Construction

This project features two (2) rainwater impoundment structures totaling 545,000 gallons for cultivation. Pond number one is designated for use on this parcel and pond number two is for the project ending in 06. This parcel has three (3) water diversions from an unnamed spring, one (1) of which is undeveloped and two (2) are developed for domestic use and fire suppression. This project is supported by a permitted back-up well, not currently in use, intend for cultivation and domestic use.

Approximated water use for activities are denoted within the *Cultivation Schedule* under the Cultivation Plan. Monthly monitoring and annual reporting must be implemented to identify actual total uses for domestic and cultivation activities.

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## Security Plan

The Project's *Security Plan* includes product security, inventory management, and diversion prevention. Pertinent regulatory language includes the following:

Assembly Bill 604 (AB-604), Article 3, Mandatory Commercial Registration, § 26040 (5): "Security requirements, including, but not limited to, procedures for limiting access to facilities and for the screening of employees. The department shall require all registrants to maintain an accurate roster of any employee's name, date of birth, and relevant identifying information, which shall be available for inspection by the department or State or local law enforcement upon demand."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(3): "Operating and inventory control procedures to ensure security and prevent diversion."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(4): "Detailed operating procedures for the proposed facility, which shall include, but not be limited to, provisions for facility and operational security, prevention of diversion, employee screening, storage of medical cannabis, personnel policies, and recordkeeping procedures."

### Summary

The Security Plan details efforts to prevent loss and diversion of medical cannabis product at all stages of its cultivation and processing, including drying, trimming, curing, processing, and packaging. Robust recordkeeping would be implemented and maintained for quality assurance, inventory management, and prevention of diversion.

## Measures of Security

Several security measures would be involved in the comprehensive protection of medical cannabis product during the cultivation and processing lifecycles. These include exterior lighting, alarms, cameras and video capture, and the hardening of doors, windows, and fencing.

Security measures for this project would encompass, at a minimum:

- Locked containment for product processing and storage (to be developed).
- Locked gate(s) into entry of property (*Two (2) gates*).
- Surveillance and monitoring systems (to be developed as per the State's requirements).

## Points of Security

Property Wide Surveillance

Two Gated Entry Points

## Inventory Management

A rigorous system of recordkeeping and reporting would be facilitated to adhere to the State's Track and Trace requirements of all cannabis products. This would include (but not be limited to) flower, trim, and stem to ensure zero diversion of product throughout processing.

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To prevent loss and diversion, all cannabis products would be stored under locked containment during the drying, curing, and packaging phases of processing. Products would also be subject to conformance with a checks and balances system to ensure the prevention of unintentional diversion.

#### Prevention of Diversion

The most vulnerable stage of product security is transit to retail outlets. The best way to ensure product safety and prevention of diversion and loss is to maintain adequate chain of custody records via the Agricultural Commissioner.

This would occur under the oversight of the CDFA, in congruence with SICPA's Track and Trace Program. Additionally, retail outlets would be informed of expected delivery quantities. This would include packing slips, tamper-evident seals, verification of credibility, liability coverage, and manifests provided by licensed transporters.

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## Appendices

The following regulatory information sources contributed to the development of this narrative.

### Source Guide for Federal & State Requirements for Employee & Migrant Housing

#### Housing Standards/Requirements for Employee/Migrant Housing Caretakers

##### *Health & Safety*

- First Aid.
- Communicable Diseases.
- Hand Washing, Bathing, and Laundry.
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- Garbage and Refuse.
- Insects and Rodents.

##### *Occupancy & Structural Guidelines*

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- Housing Structure.
- Postings of Required Information.
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- Construction and Repair.
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- Electrical.
- Lighting.
- Heating.
- Liquid Propane (LP) Gas.

##### *Waste Management*

- Toilets.
- Water Supply.
- Screens.
- Sewage.

##### *Enforcement*

- Enforcement and Penalties.
- Remediation and Mitigation.

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## Sources of Additional California Regulatory Information

SOURCES OF ADDITIONAL INFORMATION			Sacramento	San Benito	San Joaquin						
<p>More specific information can be obtained by:</p> <ol style="list-style-type: none"> <li>Review of the following reference documents at law and public libraries: <ul style="list-style-type: none"> <li>California Health and Safety Code, Division 13, Part 1, beginning with Section 17000.</li> <li>California Code of Regulations, Title 25, Chapter 1, beginning with Section 600.</li> <li>California Code of Regulations, Title 24, California State Building Code.</li> <li>Federal Migrant and Seasonal Agricultural Worker Protection Act</li> <li>Code of Federal Regulations, Title 29, Parts 500 through 500.270.</li> <li>Code of Federal Regulations, Title 29, Part 1910.142 (OSHA Reg.)</li> </ul> </li> <li>Obtaining or purchasing copies of documents as follows: <ul style="list-style-type: none"> <li><u>CALIFORNIA HEALTH AND SAFETY CODE, DIVISION 13, PART 1</u> (Employee Housing Act) can be purchased from: West Publishing Company, PO Box 64526, St. Paul, MN; telephone 800-328-4880.</li> <li><u>CALIFORNIA CODE OF REGULATIONS, TITLE 25, CHAPTER 1,</u> <u>and the CALIFORNIA CODE OF REGULATIONS, TITLE 24.</u> Can be purchased from: Barclays Law Publishers, Attention: CCR/Agency Services Representative 400 Oyster Point Blvd., PO Box 3006, South San Francisco, CA. 94083 800-888-3600 or on the internet at <a href="http://www.leginfo.ca.gov/calaw.html">http://www.leginfo.ca.gov/calaw.html</a></li> <li><u>MIGRANT AND SEASONAL AGRICULTURAL WORKERS PROTECTION ACT</u> <u>and OSHA REGULATION 1910.142</u> Can be obtained by contacting the Wage and Hour Division of the U.S. Department of Labor offices as shown on this page or on the internet at, <a href="http://www.dol.gov/esa/whd/mspa/index.htm">http://www.dol.gov/esa/whd/mspa/index.htm</a></li> </ul> </li> <li>Contacting the appropriate government offices listed below:</li> </ol>			<p><b>Sacramento</b> Environmental Health 8475 Jackson Road, 240 Sacramento, CA. 95826 (916) 875-8484</p> <p><b>San Mateo</b> Health Services Agency 455 County Center, 4<sup>th</sup> Fl. Redwood City, CA 94063 (650) 363-4305</p> <p><b>Stanislaus</b> Environmental Res. 3800 Cornucopia Way, Ste. C Modesto, CA 95358-9492 (209) 525-6700</p>	<p><b>San Benito</b> Building and Safety 3224 Southside Road Hollister, CA 95023 (831) 637-5313</p> <p><b>Santa Cruz</b> Health Services Agency 701 Ocean Street, Rm 312 Santa Cruz, CA 95060 (831) 454-2022</p> <p><b>Tulare</b> Resource Management Agency 5961 S. Mooney Blvd Visalia, CA 93277-939 1-800-228-6133</p>	<p><b>San Joaquin</b> Public Health Services 304 E. Weber Ave. Stockton, CA 95202 (209) 468-3426</p>						
<p>STATE OF CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT DIVISION OF CODES AND STANDARDS</p>			<p><b>NORTHERN CALIFORNIA:</b> (North of Fresno County) 9342 Tech Center Dr #550 Sacramento, Ca. 95826 (916) 255-2501</p>			<p><b>SOUTHERN CALIFORNIA</b> (South of Madera County) 3737 Main Street, Ste 400 Riverside, CA 92501 (951) 782-4420</p>					
<p>U.S. DEPARTMENT OF LABOR WAGE &amp; HOUR DIVISION</p>			<p><b>LOS ANGELES</b> 300 South Glendale Ave., 400 Glendale, CA. 91205-1752 (818) 240-5274/75</p> <p><b>WEST COVINA</b> 100 North Barranca St., 850 West Covina, CA. 91791 (626) 966-0478</p> <p><b>SAN DIEGO</b> 5675 Ruffin Rd, 320 San Diego, CA. 92123-1362 (619) 557-5606</p>			<p><b>SAN FRANCISCO</b> 455 Market St., 800 San Francisco, CA. 94105 (415) 744-5590</p> <p><b>SACRAMENTO</b> 2800 Cottage Way, Rm. W-1836 Sacramento, CA. 95825-1886 (916) 978-6123</p>					
<p>If the housing is located in one of the following counties contact the county office listed below:</p> <table border="0"> <tr> <td><b>Fresno</b> Environmental Health Systems 1221 Fulton Mall, 3<sup>rd</sup> Floor Fresno, CA 93775-1867 (559) 445-3391</td> <td><b>Kern</b> Environmental Health 2700 M. Street, Suite 300 Bakersfield, CA 93301 (661) 862-8700</td> <td><b>Merced</b> Environmental Health 777 W. 22<sup>nd</sup> St. Merced, CA 95340 (209) 381-1100</td> </tr> <tr> <td><b>Monterey</b> Environmental Health 1270 Natividad Road Salinas, CA 93906 (831) 755-4500</td> <td><b>Napa</b> Environmental Health 1195 Third Street, 101 Napa, CA 94559 (707) 253-4471</td> <td><b>Orange</b> Environmental Health Div. 2009 E. Edinger Avenue Santa Ana, CA 92705 (714) 667-3600</td> </tr> </table>			<b>Fresno</b> Environmental Health Systems 1221 Fulton Mall, 3 <sup>rd</sup> Floor Fresno, CA 93775-1867 (559) 445-3391	<b>Kern</b> Environmental Health 2700 M. Street, Suite 300 Bakersfield, CA 93301 (661) 862-8700	<b>Merced</b> Environmental Health 777 W. 22 <sup>nd</sup> St. Merced, CA 95340 (209) 381-1100	<b>Monterey</b> Environmental Health 1270 Natividad Road Salinas, CA 93906 (831) 755-4500	<b>Napa</b> Environmental Health 1195 Third Street, 101 Napa, CA 94559 (707) 253-4471	<b>Orange</b> Environmental Health Div. 2009 E. Edinger Avenue Santa Ana, CA 92705 (714) 667-3600			
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## Federal Governing Bodies & Regulatory Framework

- U.S. Department of Agriculture.
- U.S. Environmental Protection Agency.
- Farm Labor Standards Act.
- Farm Bill 2014.
- Clean Water Act (CWA)/Safe Drinking Water Act (SDWA).
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- Resource Conservation & Recovery Act (RCRA).
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA/Superfund).
- Clean Air Act (CAA).
- Emergency Planning & Community Right to Know Act (EPCRA).

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## Summary of Employment Requirements for California Agricultural Employers

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- FLC Payroll Records.
- Leave of Absence.
- Family and Medical Leave Act.
- California Family Rights Act.
- Discrimination.

#### Summary of Employment Requirements for California Agricultural Employers

- Applicant Identification Records.
- EEOC EEO-1 Report.
- Recordkeeping and Inspection Requirements.
- Inspection and Copying of Personnel Files.
- Inspection and Copying of Payroll Records.
- Workers' Compensation.
- Employee Claim Form.
- Form to Indicate Physician or Chiropractor.
- Child Labor.
- Permit to Employ and Work Permit.
- Date of Birth.
- Checklist of Forms and Reports.

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## Glossary of Abbreviations & Definitions

**AAPCC:** American Association of Poison Control Centers  
**AB:** Assembly Bill  
**ABA:** Architectural Barriers Act  
**ADA:** Americans with Disabilities Act  
**ALRA:** Agricultural Labor Relations Act  
**ALRB:** Agricultural Labor Relations Board  
**APN:** Assessor's Parcel Number  
**AUMA:** Adult Use Marijuana Act (Prop 64)  
**BCC:** Bureau of Cannabis Control  
**BMCR:** Bureau of Medical Cannabis Regulation  
**BMP:** Best Management Practices  
**BOE:** Board of Equalization  
**CAC:** County Agricultural Commissioner  
**Cal OES:** California Office of Emergency Services (*See also OES*)  
**CALRA:** California Agricultural Labor Relations Act  
**CALRB:** California Agricultural Labor Relations Board  
**CBC:** California Building Code  
**CBO:** Cannabis Board Order  
**CCR:** California Code of Regulations (also Cal. Code Regs.)  
**CDFA:** California Department of Food and Agriculture  
**CDFFP:** California Department of Forestry and Fire Protection (CAL FIRE)  
**CDF:** California Department of Fire  
**CDFW:** California Department of Fish and Wildlife  
**CDIR:** *Also see DIR:* California Department of Industrial Relations  
**CD:** Community Development  
**CDPH:** California Department of Public Health  
**CDWC:** California Division of Worker's Compensation  
**CEH:** Center for Environmental Health

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**CEQ:** Council on Environmental Quality  
**CEQA:** California Environmental Quality Act  
**CFR:** Code of Federal Regulations  
**CFSAN:** Center for Food Safety and Applied Nutrition  
**CLRB:** California Labor Relations Board  
**CSLB:** California State Licensing Board  
**CMCLUO:** Commercial Medical Cannabis Land Use Ordinance  
**CP:** Community Planning  
**CPD:** County Planning Department  
**CPRC:** California Public Resources Code  
**CSWC:** California State Warning Center  
**CUPA:** California Unified Program Act  
**DCA:** Department of Consumer Affairs  
**DD:** Development Department  
**DEH:** Division of Environmental Health  
**DFEH:** Department of Fair Employment and Housing  
**DHHS:** Department of Health and Human Services  
**DIR:** Department of Industrial Relations  
**DLSE:** Department of Labor Standards Enforcement  
**DL-WHD:** Department of Labor, Wage and Hour Division  
**DOL:** Department of Labor  
**DPH:** Department of Public Health  
**DPR:** Department of Pesticide Regulation  
**DWC:** Division of Workers' Compensation  
**DWR:** Division of Water Rights  
**EEOC:** Equal Employment Opportunity Commission  
**EIR:** Environmental Impact Report  
**EPA:** Environmental Protection Agency  
**FLC:** Farm Labor Contractor  
**FLSA:** Fair Labor Standards Act  
**GAP:** Good Agricultural Practices

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**GHP:** Good Handling Practices

**GP:** General Plan

**HIPP:** Heat Injury Prevention Plan

**HSC:** Health and Safety Code

**HUC:** Hydrologic Unit Code

**IIPP:** Injury and Illness Prevention Program

**IPM:** Integrated Pest Management

**ISWDU:** Initial Statement of Diversion and Use

**LLC:** Limited Liability Company

**LRDP:** Long Range Development Plan

**LSA:** Lake and Streambed Alteration

**LSAA-1600/1602:** Lake and Streambed Alteration Agreement

**LC:** Labor Commissioner

**MBC:** Medical Board of California

**MCRSA:** Medical Cannabis Regulation and Safety Act

**MND:** Mitigated Negative Declaration

**MOU:** Memorandum of Understanding

**MRP:** Monitoring and Reporting Program

**MSDS:** Material Safety Data Sheet

**MSPA:** Migrant Seasonal Protection Act

**NCRWQCB:** North Coast Regional Water Quality Control Board

**ND:** Negative Declaration

**NEPA:** National Environmental Policy Act

**NLRB:** National Labor Relations Board

**NMBC:** Non-Profit Mutual Benefit Corporation

**NOE:** Notice of Enrollment

**NOI:** Notice of Intent

**NOP:** National Organic Program

**NRCS:** Natural Resources Conservation Service

**NWIC:** Northwest Information Center

**OES:** Office of Emergency Services

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**OMCS:** Office of Manufactured Cannabis Safety

**OMRI:** Organic Materials Review Institute

**OPR:** Office of Planning and Research

**OSHA:** Occupational Safety and Health Administration

**OSHG:** Occupational Health and Safety Guidelines

**OSHT:** Occupational Safety and Health Technician

**PG&E:** Pacific Gas and Electric

**PHTP:** Pesticide Handling Training Program

**PPE:** Personal Protective Equipment

**REI:** Restricted Entry Interval

**SB:** Senate Bill

**SDS:** Safety Data Sheets (*See also MSDS*)

**SDU:** Small Domestic Use

**SIU:** Small Irrigation Use

**SOP:** Standard Operating Procedures

**SWRCB:** State Water Resources Control Board

**THPO:** Tribal Historical Preservation Office

**USC:** United States Code

**USCB:** United State Census Bureau

**USDA:** United States Department of Agriculture

**US-DOL:** United States Department of Labor

**USDHHS:** United States Department of Health and Human Services

**WBO:** Water Board Order

**WDID:** Waste Discharge Identification

**WHD:** Wage and Hour Division

**WRPP:** Water Resource Protection Plan

**WWD:** Waste Waiver Discharge Program

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