

Site Management Plan

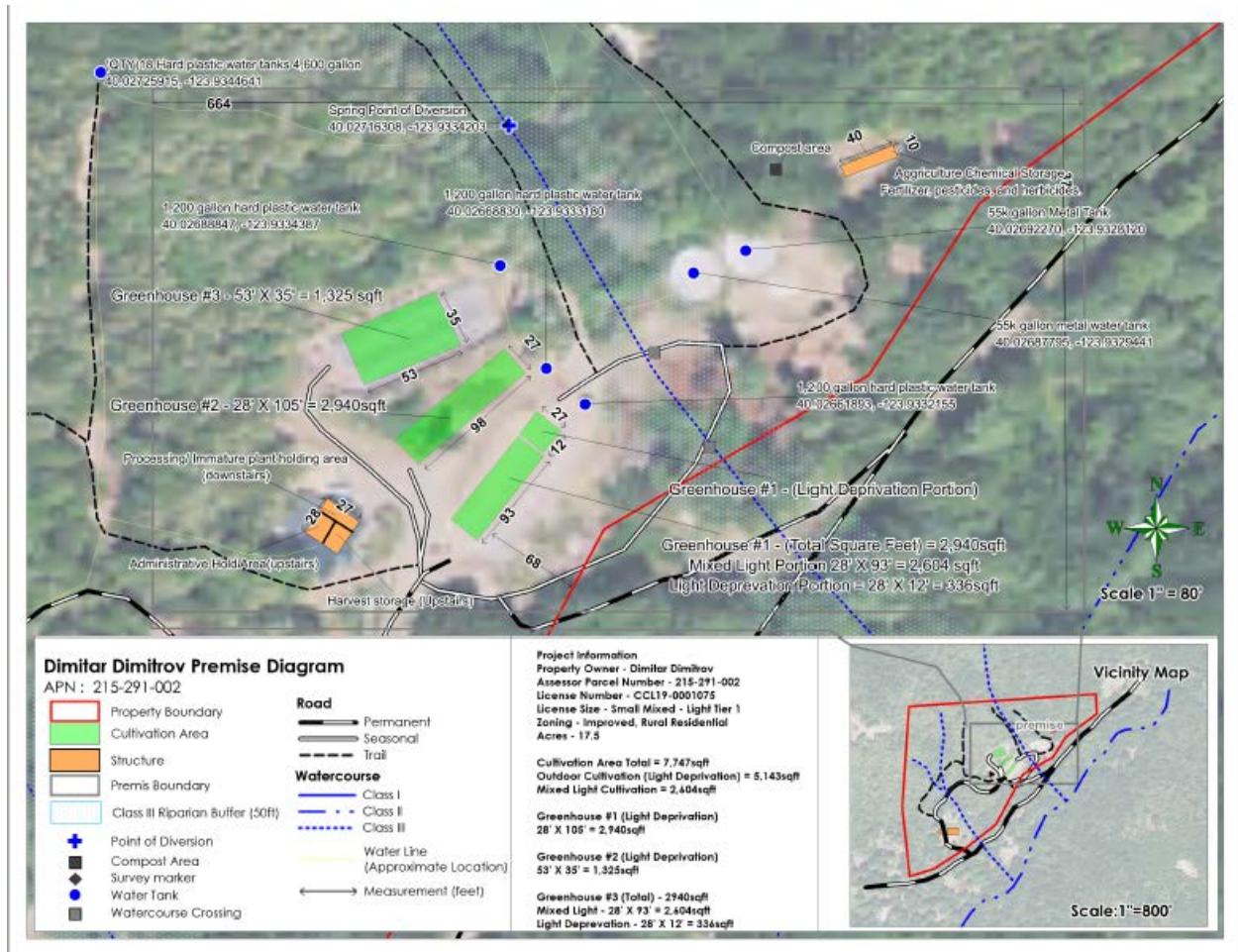
Dimitar Dimitrov

250 Gibson Creek Rd. Whitethorn, CA 95589

APN: 221-141-027

By: ETA Humboldt

Prepared by Vanessa Valare



General Site Information

Discharger: Dimitar Dimitrov

Landowner: Dimitar Dimitrov

GPS: 40.0266, -123.9340

Location: 250 Gibson Creek Rd. Whitethorn, CA 95589

Parcel Number: 215-291-002

Parcel Size: 17.56 Acres

Disturbed Area: 19,000 ft².

Cultivation Area and Type: 2,635 ft² mixed light and 5,143 Outdoor
Light Deprivation

Tier Level:1

Risk Level: Low

1. Site Characteristics

1.1 General

This property is 17.56 acres of evergreen forest, mixed forest and grassland. Total disturbed area is approx. 19, 000 square feet. Total cultivation area is 7,778 Square feet.

The applicant is dedicated to minimizing any negative impact to the rural community and natural environment surrounding this parcel. This would include eliminating light pollution, noise pollution, or any other adverse effect to neighbors. The applicant adheres to BMP in protecting the environment and works closely with county and state agencies to keep in compliance and run a safe clean farm. The applicant functions with great regard for the ecosystem in which it operates.

- A. The applicant's plans are to use the natural prime ag soils and only organic amendments to fortify the soil as needed.
- B. Soil samples will be taken and analyzed to ensure proper balance of nutrients are being used.
- C. Branches harvested during fuel reduction are chipped and used in swales, pathways, and remediation buffers to prevent nutrient runoff, reduce soil temperature, store carbon, and promote a healthy soil microbial community;
- D. Soil fertility is closely monitored to prevent excess use of fertilizers;
- E. Only organic products are used in the cultivation of cannabis;
- F. Cultivated soils are cover cropped and mulched in the off season to enhance soil fertility and eliminate runoff; and
- G. The entire site is monitored to identify and correct any potential sources of environmental degradation and maintain a protective riparian buffer

1.2 Structures on Site

Structures on the property relevant to the cultivation process include:

Greenhouse 1- 2,940 ft² Greenhouse with 2,604 ft² of Mixed light, and 336 ft² of Light Deprivation Cultivation.

Greenhouse 2- 2,940 ft² of light deprivation cultivation.

Greenhouse 3- 1325 ft² of light deprivation cultivation.

Shed- 400ft² shed built pre 2005 used for misc. storage

Processing Building- 3,000ft², used for drying, processing, propagation and storage

1.3 Access Roads

The site is located on Gibson Creek Road in the Whitethorn Area. Personal driveway is shared with no additional neighbors. To access property from Eureka CA, via Highway 101:

Follow US-101 S to Redwood Dr. Take exit 642 from US-101 S for Redwood Drive toward Redway (63.2 miles) Take Briceland Rd to Gibson Creek Rd in Whitethorn

1.4 Stream Crossings

There is one unnamed class III Tributary on the property. There is a total of five stream crossings on the parcel. There are four rocked crossings and one culvert. Three stream crossings are on a main road, while the other two are on rarely used roads on the parcel.

1.5 Electricity

Electricity for this parcel is provided by PG&E.

1.5.1 Artificial Lighting

Greenhouse 1 is divided, and is 2604ft² of mixed light, with 336ft² of outdoor light deprivation Greenhouses two and three have no lights and are used for outdoor light deprivation cultivation.

Greenhouse 1- has twenty-one (21) 600-watt lights =12,600 watts.

12,600W/2,604 sq. ft. =5.44w/sq. ft.

Greenhouse 2- has no lights at all and is an outdoor light deprivation greenhouse

Greenhouse 3- has no lights at all and is an outdoor light deprivation greenhouse

1.6 Species of Concern

Species that have been recorded within the quadrat this site is located in include:

Foothill Yellow-Legged Frog

Southern Torrent Salamander

Red-Bellied Newt

Northern Spotted Owl

Klamath Crayfish

Coho Salmon – Southern Oregon/Northern

California ESU

Steelhead- Northern California DPS

Summer Run Steelhead Trout

Chinook Salmon - California Coastal ESU

Clear Lake - Russian River Roach

Western Bumble Bee

Obscure Bumble Bee

Sonoma Tree Vole

2. Cultivation Plan

2.1 Grow Areas

Areas designated for cultivation on site include: three (3) greenhouses total 7,778 sq. ft. in which mature plants grow, one (1) processing building (3,000ft²) used for drying, curing, processing, and propagation one (1) storage shed (470ft²) used to store nutrients, refuse and recycling., one (1) residence (2,000ft²), used as a place of living and a break area. Total cultivation area is 7,778 square feet.

2.2 Harvesting

Cannabis will be harvested using gloves and clean tools. All cannabis will be hung to dry on-site in the processing building. A dehumidifier and fans as well as will be added to the processing building. Cannabis will be dried for 10-21 days on lines in this area depending on weather. The room will have proper ventilation, fans, and dehumidifiers to maintain proper environment. Moldy cannabis will be removed and destroyed using county and state approved procedures for holding and destroying unwanted product.

Cannabis trimming will occur as cannabis becomes ready from curing process. Using a processing center for trimming would be the ideal scenario in the future. Until then, trimming will physically take place in the processing building with plenty of ventilation and fresh air or outside when weather permits. The applicant plans to trim the cannabis them self by hand with the aid of a trim machine. If needed they will hire independent contractors with processor's licenses to help. Processed cannabis will be bagged into turkey bags or sealed bags to be held until a distributor is ready. The trim or remaining leaves from processed cannabis, will be bagged into brown lawn bags and into contractor bags to be stored until needed, sold or destroyed in the legal manner.

2.2.1 Independent Contract Workers

The applicant intends to do all the work themselves, however if the need arises for help independent contractors will be hired to help in their respective fields. Independent contractors will have access to parking, spacious work zone, clean supplies for task, hand washing areas with soap, and a portable toilet. All areas will be kept clean and in good condition. All independent contractors will have access to personal safety equipment to meet the needs of the job for example, face mask, gloves, Tyvek suits, safety glasses, rubber boot covers etc. For the purpose of this document the term “employee” will refer to all people working on site. Additionally, the following practices will be implemented and only employ persons for hire as allowable by law. At all times workers shall have access to safe drinking water, toilets and handwashing facilities. Applicant has created a Worker Safety Practices outline as follows:

Safety protocols will be implemented to protect the health and safety of employees. All employees shall be provided with adequate safety training relevant to their specific job functions, which may include:

- 1) Employee accident reporting
- 2) Security breach
- 3) Fire prevention
- 4) Materials handling policies
- 5) Use of protective clothing such as long sleeve shirts, brimmed hats, and sunglasses.

Each garden site and or processing area have the following emergency equipment:

- 1) Personal protective equipment including gloves and respiratory protection are provided where necessary
- 2) Fire extinguisher
- 3) First Aid Kit
- 4) Snake Bite/Bee Sting Kit
- 5) Eye Washing Kit

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

2.3 Monthly Cultivation Site Activities

Table 1: Monthly Cultivation Site Activities

Month	Activities
January	Finish processing of fall harvest, trimming and storage. Plan new year. Mow cover crop. Check greenhouse for issues/fix. Check water lines, tanks and all equipment for repairs or damages. Make plan for repairs.
February	Work on trenches/and holes for plants and layer more compost in beds. Treat compost if necessary. Finishing processing last year's crop if necessary.
March	Get clones from other permitted grow operation. Transplant and move into processing building with seedlings. Amend beds, fix fences, service equipment, make plan for independent contractors such as painting, fence building, greenhouse fixing, etc.
April	Amend and start turning beds, prepare soil and supplies for greenhouse plants Add nematodes compost for pest prevention. Mid- April move first round of plants to greenhouses. Weed whacking, mowing, and brush cleanup.
May	Plant cannabis plants in main garden. Spray with preventive sulfur. Treat with biodynamic preparations for pest control and mold control. Greenhouse plants switched into flower using a blackout cover mid-late May. Turn beds, fix/ replace and clean drip emitters, check timers. Double check all water systems for leaks and clogs. Put out sound sensors for rodents.
June	Hay put over each trench for water retention and erosion prevention. Regular feeding schedule of compost teas adhered to. Pests are dealt with as they arise with oils, nematodes and predator mites from compost. Procure next round of plants from licensed nursery or make clones from existing mother plants.
July	Harvest greenhouse, replant with new clones from mother plant or permitted nursery. Treat plants with preventive measures. Harvested flowers to hang in garage, then to be cured and hand trimmed per processing plan.
August	Finish processing July's harvest. Monitor water supply, check lines and all areas for insect/ animal disturbance.
September	Prepare for Harvest. Clean and prepare lines and drying spaces in garage. Clean all supplies and purchase new items needed. Harvest, cure and trim cannabis.
October	Harvest greenhouses and process as outlined above. Pull all root-balls, pack hay and cover crop seeds on beds. Pull drip system. Check all equipment and tools for leaks and damages before storing for winter. Store all supplies possible, cleanup site.
November	Winterize water system, greenhouse and sheds. Clean up drying rooms remove all lines and debris. Put away all supplies i.e. fans, dehumidifiers. Continue processing cannabis as outlined above.
December	Start amendments for winter. Prep all water and water storage system for shut down. Clean all garden implements. Put all left over supplies away. Driveway fixing, other farm/garden maintenance.

3. Water

3.1 Source and System

The irrigation water source for this operation is spring water diversion stored in water tanks that have a capacity of approximately 202,000 gallons. There are 20 x 4,600g capacity tanks and 2 x 55,000g capacity tanks. There is a spring labeled “Spring Point of Diversion” on the map, used to fill storage tanks during diversion period, with Small Irrigation Use right H504700.

This spring is used as direct diversion during forbearance for domestic only, with domestic use right S026468.

3.2 Storage

There are twenty-two (22) water storage tanks present on the property.

Twenty (20) 4,600-gallon HDPE water storage tanks filled from the spring/stream for cannabis/domestic use

Two (2) 55,000-gallon water storage tanks filled from the spring/stream for cannabis/domestic use

3.3 Use

The water is used for on site irrigation and foliar spraying. The irrigation systems employed include drip irrigation and hand watering. Domestic water is used for the residence.

3.4 Conservation Methods Employed

Water use is monitored. Rice hay is utilized on surface of garden beds to reduce evaporative water loss.

3.5 System Maintenance

Entire water system including manifolds and fittings are inspected weekly for leaks, and drip system is inspected daily for leaks and damage.

4. Erosion and Sedimentation

4.1 Points of Concern

Previous cultivation areas in which erosion issues were present have been decommissioned and are being re-vegetated. No visible erosion control issues currently present on the site.

4.2 Soil Management

The soil used onsite consists of a premixed soil blend in combination with coco coir. Soil deficiencies are determined by testing the soil, observation of the crop health and comparison of crop yields. Soils on site are reused and amended, rather than disposed of. This site has no problems with soil erosion.

4.3. Maintenance

Some of the soil conservation measures employed include the use of firebreaks, the encouragement of winter cover crops and general maintenance of the wildlife habitat.

5. Fertilizers, Herbicides and Pest Management

The applicant will follow best organic operation practices. Fertilizers, amendments or other agro-chemicals will be stored in dedicated locations within the first-floor garage of the residence. All fertilizers or other regulated and non-regulated agro-chemicals shall be stored within covered areas with secondary containment.

5.1 Herbicides/Weed Control

Biological, physical and cultural methods of weed control are employed. Hand-pulling weeds and weed eating are the primary methods used onsite for weed reduction.

5.1.2 Storage

Herbicides and fertilizers present on site will be stored in an insulated garage or shed with a locked door

5.2 Pest Management

This Pest Management Plan was prepared to be in compliance with California Department of Food and Agriculture requirements for CalCannabis cultivation licensing. This plan describes various pest management options that the applicant will employ depending on conditions and circumstances. All pesticides and practices used will comply with California Department of Pesticide Regulation and the Humboldt County Agricultural Commissioner's enforcement the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code, and Title 3 of the California Code of Regulations.

The applicant will be utilizing proper crop spacing, using proper nutrient levels and pH balance to minimize the spread of insects. The applicant will choose plant strains with genetics that have resistance to pest. Timing crop planting will also be utilized.

If deemed beneficial, the applicant will utilize lady bugs to control mite infestations, or any other predator insect that is approved for use.

The applicant will be utilizing chemicals as a preventative. The chemicals will be applied as a foliar spray. All products are OMRI listed and are organic.

Product Name	Active Ingredients
Neem Oil	Azadirachtin
Power SI	Silicic Acid
Micro-ionized Sulfur	Sulfur
Green Cleaner	Soybean Oil, Sodium Lauryl Sulfate, Citric Acid, Isopropanol Alcohol

5.2.2 Storage

All chemicals shall be stored and handled according to the manufacturers recommendation and as outlined by the CDFA or any other best practices as outlined by a cannabis licensing bureau.

Pesticides, fungicides and other biocides on site will be stored in a shed with a concrete floor with a locked door.

6. Petroleum, Gas and Oil

6.1 Use

Petrol products will be used in a generator on site to power artificial lighting, fans, dehumidifiers and other electric devices associated with the cultivation process only on an emergency basis PG&E provided power fails.

6.2 Storage

The petroleum products will be stored in approved containers in a covered shed with containment devices in place.

7. Waste

7.1.1 Cultivation Waste

CERCC (Clean Energy Resource Conservation Commission) requires that the project be in compliance with the California Integrated Waste Management Act (CIWMA). In addition to cannabis waste, which is regulated by CERCC, the CIWMA requires that the project manage recycling of commercial solid waste and organic waste. The following project policies are regulated by local and state requirements:

- A. All cannabis waste shall be stored in a secure waste receptacle, or secured area, and disposed of in accordance with local and state regulations. “Secure waste receptacle” or “secured area” means that physical access to the receptacle or area is restricted to the licensee and its employees, or the local agency, or waste hauler franchised or contracted by a local agency.
- B. Public access to the designated cannabis waste receptacle or area shall be strictly prohibited.
- C. All commercial solid waste shall be stored separately from cannabis waste in disposal bins secure from wildlife and watershed discharge, divided out from trash and recyclables, and disposed in accordance local and state regulations.
- D. All hazardous waste regulated by the Integrated Pest Management Plan shall be dispose of properly utilizing protocols within that plan in compliance with all local and state regulations.

7.1.2 Tracking, Records, and Inspections

CERCC requires that the project be in compliance with the Track-and-Trace System and local requirements. The following policies shall be implemented to ensure compliance with the local and state requirements:

A. In addition to all other tracking requirements, disposal of cannabis waste shall use the Track-and-Trace System with documentation to ensure cannabis waste is identified, weighed, and tracked while on premises and when disposed.

B. All cannabis plant material identified as cannabis waste shall be reported in the Track-and-Trace System made within three (3) business days of the change in disposition from cannabis plant material into cannabis waste scheduled for destruction or disposal.

C. Review of on-site cannabis, Track-and-Trace System records, cannabis waste, commercial waste, and any other records shall be available for CDFA (California Dept of Food and Agriculture) inspection or their designated representative. Inspections shall occur at standard business hours from 8:00am to 5:00pm. Prior notice for inspections is not required by the inspecting agency.

D. No person shall interfere with, obstruct or impede inspection, investigation or audit. This includes, but is not limited to, the following actions: Denying the department access to the licensed premises. Providing false or misleading statements. Providing false, falsified, fraudulent or misleading documents and records, and failing to provide records, reports, and other supporting documents.

E. Accurate and comprehensive records shall be maintained on-site for seven (7) years regarding cannabis waste which are subject to CDFA inspection that account for, reconcile, and evidence all activity related to the generation or disposition of cannabis waste.

7.1.3 Internal Waste Management Policies

The following waste management policies shall be implemented to ensure compliance with the local and state regulations, as well as CIWMA, CERCC and, CWMP (Cannabis Waste Management Plan):

A. The CWMP shall be retained on-site at all times. B. Each new laborer that comes onto the site shall be provided with a copy of the CWMP and it shall be their responsibility to read the CWMP.

C. The operator shall instruct all laborers as to the location and proper disposal of cannabis waste.

D. The operator shall monitor the process of waste management and reuse of cannabis waste to ensure compliance with the CWMP, local requirements, Integrated Waste Management Act, and CERCC.

E. The operator shall ensure that all supporting documentation which demonstrates compliance with the CWMP is provided to the local or state enforcement agency upon request or when required.

F. Waste reduction and recycling strategies shall be periodically reviewed.

G. Every effort shall be made to use to reduce the amount of cannabis waste sent to landfills by on-site composting and reuse.

H. Any person hauling away cannabis waste shall notify the operator of the materials, location of disposal, and provide written record.

I. The waste hauler shall track the total amount of cannabis waste leaving the project by weight or by volume and supply the operator with copies of tickets or detailed receipts from all loads of cannabis waste removed from the site

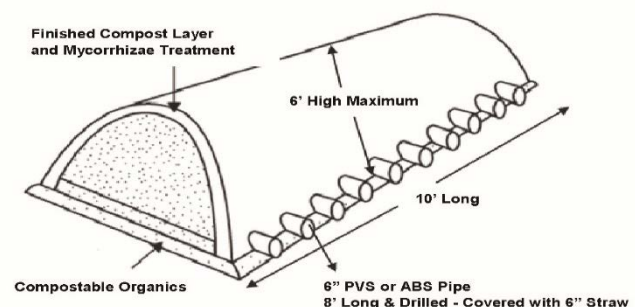
7.1.4 On Site Cultivation Waste Disposal

The CWMP identifies one or more of the following approved methods for cannabis waste and organic waste according to the CIWMA, CERCC and, CWMP:

On-premises disposal of cannabis and organic waste: Composting cannabis waste shall be in compliance with title 14 of the California Code of Regulations Division 7 Chapter 3.1 (commencing with Section 17850) by one or more of the following methods:

Passive Aerated Static Pile: a composting process that is similar to the aerated static pile except that the air source may or may not be controlled.

Land Application: final deposition of compostable material shall be spread on-site land (i.e. compost used within gardens).



7.2 Trash

Rubbish is stored in a secure area in the garage and is removed on a monthly basis. Solid waste is hauled to an approved county location.

The CWMP identifies one or more of the following methods for managing solid waste and recyclables according to the CIWMA, CERCC and, CWMP:

self-haul refuse and recycling to approved county location;

Redway Transfer Station

Conservation Camp Rd.

Redway, CA 95560

7.3 Domestic Wastewater

An existing septic system is utilized in handling domestic wastewater. Primary and secondary leach fields have been identified. System is in good functioning condition.

7.4 Hazardous Waste

Gasoline and propane are stored on site for heating and power supply. All fuels are stored in approved storage containers. Diesel and gasoline are stored in covered area with containment device. All fertilizers, soil amendments, and pesticides used on site are stored indoors in approved containers. Bleach and alcohol are used on site to clean small hand tools typically these products would be stored in office areas in one-gallon bottles or smaller. Other household sanitizers may be used in kitchen and bathrooms. Small equipment and generator oil may be changed on site if said procedure will be completed over containment devices to prevent spillage

8. Appendix

8.1 Best Practical Treatment or Control Measures

Other measures to be implemented

Description BMP procedure

- List of record keeping, monitoring, and other measures needed for compliance.
- Install flow meters for Install flow meters water use and record water use weekly.
- Use log pages and provide additional documentation as needed.
- Record water use.
- Read flow meters weekly and record irrigation use by water source.
- Use log pages provide additional documentation as needed.
- Wet weather road inspection.
- Inspect road during wet weather annually.
- Observe water and sediment discharge.
- Document observations, Apply corrective measures to prevent erosion as needed based on observations.
- Pre and post season inspection, conduct self- assessment twice annually.
- Use log pages provide additional documentation as needed.
- Keep chemical storage and use logs
- List chemicals stored onsite and information about quantities used and frequency applied.
- Record annual fertilizer and amendment use.

8.2 Example Logbook

Pre-season Self-Assessment (to be completed after March and before April 15 each year)

Person Reporting: _____

Date: _____

☐ Yes ☐ No

All stockpiles, soil amendments, pesticides, and fertilizers have remained properly stored and/or contained and have not discharged from their storage/containment facility(ies).

Comments:

☐ Yes ☐ No

Implemented erosion and sediment controls have remained in place and functioning throughout the winter wet weather period, preventing sediment and turbid stormwater from discharging to surface water bodies.

Comments:

☐ Yes ☐ No

All access roads appear to be in good condition and drainage structures have been effective in preventing road surface and fill material from discharging to any surface water bodies.

Comments:

☐ Yes ☐ No

Watercourse crossing structures remain functioning throughout the winter wet weather period and there is no evidence of crossings being plugged, overtopped, and/or discharging sediment or fill material. Comments:

☐ Yes ☐ No

All water containment structures/ponds/dams have remained effective and in good condition.

Additional Findings: Please describe pre-winter BMPs applied to the site including location and methods (attach additional pages as necessary):

Comments:

Post-Season Self-Assessment (to be completed by October 15th each year)

Person Reporting: _____

Date: _____

☐ Yes ☐ N/A

All stockpiles, soil amendments, pesticides, and fertilizers have been properly stored and/or protected per Best Management Practices (BMPs).

Comments

☐ Yes ☐ N/A

Erosion and sediment controls have been properly installed and are functioning, and all areas of exposed soil have been stabilized in preparation for the winter wet weather period. Comments

☐ Yes ☐ N/A

Drainage structures (waterbars/rolling dips) have been installed and are functioning on all access roads, and all access roads intended for use during the winter wet weather period have been weatherproofed. Comments

☐ Yes ☐ N/A

Watercourse crossing structures have been correctly installed/maintained, all fill material/exposed soil has been stabilized, and are free of debris that could plug crossings over the winter wet weather period. Comments

☐ Yes ☐ N/A

All trash/refuse has been cleaned up where it cannot pass into or be transported into any water body and empty/used containers have been properly disposed per manufacturer's instructions. Comments

☐ Yes ☐ N/A

All water containment/storage ponds/dams have been inspected and appear to be in good, stable condition.

Additional Findings/Comments:

Chemical/Pesticide/Herbicide Inventory Log

List all chemicals that you have in storage. When any new pesticides, herbicides, or chemicals are brought onto the property enter the product information in this form. An example entry is provided.

Name of Product	Pest/Herb/Other	Quantity (gal/lbs)	Date	Recorded By
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Chemical/Pesticide/Herbicide Application Log

Anytime a pesticide, herbicide, or any other chemical is applied to the cannabis it will be recorded on this form. An example entry is provided.

[illegible]

Soil Amendments and Fertilizer Log

Anytime an amendment or fertilizer is used in soil building, top dressing, foliar spray, or any other application - fill out this log. An example entry is provided.

<u>Name of Product</u>	<u>Quantity (gal/lbs/etc)</u>	<u>Date Applied</u>	<u>N-P-K Ratio</u>	<u>Recorded By</u>
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Water Usage Log

Every week record the water used for cultivation using water meters. Fill out the annual total usage on the backside of this form at the end of the year. To calculate annual total, subtract the first meter reading of the year from the last reading of the year. An example entry is provided.

[illegible]

8.3 Emergency Contact Information

Dimitar Dimitrov shall visibly post and maintain an emergency contacts list which will include at a minimum:

1. Managerial and property owner contact(s):
2. Property Owner/Manager: Dimitar Dimitrov 707-613-0340
3. Emergency responder contact(s):

- a. EMERGENCY CALL 911

Site Address: 250 Gibson Creek Rd, Whitethorn, CA 95589

- b. Nonemergency Sheriff: (707) 445-7251

4. Hazardous Material/Poison control contact(s):

- a. EMERGENCY CALL 911

Site Address: 250 Gibson Creek Rd, Whitethorn, CA 95589

Poison Control Centers 1-800-222-1222

- b. Humboldt County HazMat: (707)268-8680

- c. Humboldt County Ag Dept: (707)234-6830