

Old Briceland Holding Company Microbusiness Operations Plan

Prepared for:
Old Briceland Holding Company
7777 Old Briceland Rd. Briceland CA 95542
220-241-017
04/06/2026

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1. Project Description

This application is for a project located on parcel 220-241-017, belonging solely to Rama Boyd (Old Briceland Holding Company LLC). Old Briceland Holding Company LLC is the primary cultivator, manufacturer, distributor, and retailer for this project. This project includes 9,925ft² of mixed light cultivation, as well as non-volatile manufacturing, distribution and non-storefront retail sales. This parcel has an approved cultivation permit (PLN-10697-SP) for 29,661ft² of outdoor light deprivation and mixed light cultivation. This microbusiness permit will modify that existing permit to remove 9,925ft² of the existing cultivation from permit number PLN-10697-SP, the 9,925ft² cultivation and its supporting nursery space will move to be under this microbusiness permit. No additional cultivation is planned for this microbusiness/permit modification. This project will also allow for non-volatile manufacturing, packaging, distribution, and non-storefront retail sales of all Old Briceland Holding Company LLC, and other local cannabis products.

Water for this project will still be sourced from the rainwater catchment system, and existing, approved, water usage will not change. All gardens are more than 200 feet away from nearest water supply and all gardens on this parcel are watered with drip irrigation. Power for this project is supplied by PG&E.

Old Briceland Holding Company LLC will cultivate, process, manufacture, package, distribute, and retail cannabis products under this existing permit modification/microbusiness permit. All processing, manufacturing, packaging, distribution, and retail will take place in the existing commercial processing building (permit pending).

2. Microbusiness Cultivation Plan

2.1 Cultivation Site

Cultivation area consists of 4 existing mixed light greenhouses (9,925ft²) and 992ft² of propagation space inside an existing 2,520ft² greenhouse. (Remaining 1528ft² of greenhouse will be used for propagation of existing cultivation associated with PLN-10697-SP).

Greenhouses sizes are one 35' x 95' 3,325ft², one 24' x 81' 1,944ft², one 24' x 93' 2,232ft², and one 24' x 101' 2,424ft² greenhouses for a total of 9925ft² of mixed light flowering canopy. Greenhouses are labeled on map as Micro ML 3-6.

Propagation- This is a 992ft² propagation space within an existing 2,520ft² propagation greenhouse. (Remaining space inside this greenhouse (1,528ft²) will be used for propagation for existing approved permit (PLN-10697-SP).

2.2 Immature Plants

Immature plants will be propagated from seed or purchased from a licensed nursery. Propagation of immature plants will occur in the propagation greenhouse, only minor supplemental light is used, 22w regular light bulbs.

2.3 Cultivation Cycles

The outdoor light deprivation cannabis to be harvested twice per year, the first time in July, and again in Sept/Oct.

2.4 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 layer more compost in beds. Treat compost if necessary. Finishing processing last year's crop if still necessary.
March	Get clones from licensed nursery. Transplant and move into greenhouse with seedlings. Amend beds, fix fences, service equipment, make plan for independent contractors i.e., painting, fence building, greenhouse fixing, etc.
April	Amend and start turning beds, prep dirt 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	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. 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.
July	Harvest greenhouse mid-month, replant with new clones from a permitted nursery. Treat plants with preventive measures. Harvested flowers to hang in drying area 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 as outlined above in processing plan.
October	Harvest greenhouses. 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.
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.
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3. Water Management Plan

3.1 Source and System

The water source for cultivation is a rainwater catchment system including a rainwater catchment pond and a roof and gutter rainwater collection system. The rainwater catchment pond capacity is 440,000-gallons. There is a total of ninety-seven (97) 5,000-gallon water tanks that store water in this water system. These tanks are filled by the rainwater catchment system and supplemented by the Redwood creek diversion when sufficient flows exist between November 15th and March 31st. Water from this system is used for irrigation purposes. The domestic water source for this parcel is a stream diversion and a groundwater well. The water source for manufacturing will be the stream diversion. Pond water is not acceptable for use in a manufactured product. Humboldt County has verbally approved using surface water for manufacturing as part of this project. There are an additional five 5,000-gallon HDPE water storage tanks that are used for storage of domestic water. Two of the water tanks that currently hold domestic water will be repurposed for storage of spring water used in the manufacturing process.

3.2 Storage and Use

There are ninety-seven (97) 5,000-gallon water tanks that serve this project and the remaining cultivation under approved PLN-10697-SP on this parcel. There is a total of 963,850-gallons of water storage for this project. Irrigation water use for this project is estimated to be 223,376-gallons (22.6-gall/ft²) annually. Irrigation water is used January-November. Domestic water use for this parcel is estimated to be 89,650-gallons annually.

3.3 Monthly Water Use Table

Month	Cannabis Use in Gallons Microbusiness cultivation	Cannabis Use in Gallons Cultivation License	Domestic Use in Gallons	Manufacturing use in gallons
January	18,833	37,666	6,340	15,500
February	29,336	58,673	17,730	0
March	22,613	45,226	5,840	0
April	23,746	47,493	6,660	0
May	24,210	48,420	8,940	0
June	28,936	57,873	9,010	0
July	27,809	55,619	6,030	0
August	19,409	38,818	3,430	0
September	18,564	37,128	3,400	0
October	9,920	19,840	7,770	0
November	0	0	6,000	15,000
December	0	0	8,500	15,500
Totals	223,376	446,756	89,650	46,000

4. State Water Resource Control Board Compliance

The applicant is dedicated to minimizing any negative impact to the rural community and natural environment surrounding this parcel. This includes 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 composted and eventually 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

4.1 Winterization BPTC Measures

The applicant will do his best to implement all applicable Erosion Control and Soil Disposal and Spoils Management Requirements in addition to the Winterization Requirements below by the onset of the winter period (November 15).

The applicant will do his best to block or otherwise close any temporary access roads to all motorized vehicles no later than the onset of the winter period each year.

The applicant will not operate heavy equipment of any kind at the cannabis cultivation site during the winter period, unless authorized for emergency repairs contained in an enforcement order issued by the State Water Board, Regional Water Board, or other agency having jurisdiction.

The applicant will apply linear sediment controls (e.g., silt fences, wattles, etc.) along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with sheet flow length at the frequency specified below.

The applicant will maintain all culverts, drop inlets, trash racks and similar devices to ensure they are not blocked by debris or sediment. The culverts will be inspected before the onset of fall and winter precipitation and following precipitation events that produce a lot of rainfall. We will do our best to stabilize all disturbed areas and construction entrances and exits to control erosion and sediment discharges from land disturbance.

The applicant will cover and berm all loose stockpiled construction materials (e.g., soil, spoils, aggregate, etc.) that are not actively (scheduled for use within 48 hours) being used as needed to prevent erosion by storm water. We will provide adequate cover and berm materials available onsite if the weather forecast indicates a probability of precipitation.

The applicant will do our best to apply erosion repair and control measures to the bare ground (e.g., cultivation area, access paths, etc.) to prevent discharge of sediment to waters of the state.

4.2 Best Practical Treatment or Control Measures

- Old Briceland Holding Company keeps records for monitoring, and other measures needed for compliance.
- Meters have been installed for water use and are recorded weekly by water source.
- Logs are available upon request
- All water use is recorded
- All roads are inspected after any heavy rain event for erosion control issues.
- All Roads are inspected twice annually in addition to at heavy rain events.
- All winterization protocols are followed
- Any observations are documented, and corrective measures are applied to prevent erosion as needed based on observations.
- A self-assessment is conducted twice annually, pre and post season inspection.
- Chemical storage and use logs are maintained.
- List of chemicals stored onsite and information about quantities used and frequency applied.

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):

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:

5. Stormwater Management Plan

5.1 Erosion Control

This property is mostly flat and rolling meadows in the areas where the cannabis grown. There are companion plants, native grasses and indigenous plants that grow in the gardens and around the area to also help control any type of run off. There are no signs of wastewater runoff or erosion in these gardens. Hay is also spread around the area and on the topsoil. All water tanks and water lines as well as manifolds and fittings are checked almost daily for leak or cracks.

Riparian areas will be protected utilizing the following to ensure protection of the watershed and nearby habitat. All measures of the site management plan shall be implemented. Compost bin shall be self-contained. Trash and recycling bins should be secure and dumped at local transfer stations and cover crops will be utilized.

Roads and flats are properly engineered to disperse any runoff in a manner that slows, spreads, and sinks water into vegetated meadow or forest soil. Additionally, the landscape is monitored for erosion and preemptively maintained to prevent loss of topsoil and degradation of graded features.

5.2 Sediment Erosion Prevention and Sediment Capture

Daily inspections from all personnel verify that spoils are not to be stored or placed in or where they can enter any nearby soil and surface water. Spoils will be adequately contained or stabilized to prevent sediment delivery to surface waters. Spoils generated through development or maintenance of roads, driveways, earthen fill pads, or other cleared or filled areas shall not be side cast in any location where they can enter or be transported to surface waters. The applicant will use appropriate erosion control measures to minimize erosion of disturbed areas, potting soil, or bulk soil amendments to prevent discharges of waste. Fill soil shall not be placed where it may discharge into surface water. Weed-free straw mulch is used on exposed soil and, if warranted by site conditions, shall be secured to the ground. The applicant will not plant or seed noxious weeds. Prohibited plant species, only locally native, non-invasive, and non-persistent grass species will be used for temporary erosion control. The applicant will incorporate erosion control and sediment detention devices and materials into the design, work schedule, and implementation of all cannabis cultivation activities. Measures to limit or prevent erosion, include, but are not limited to, removal of fill from watercourses, stream restoration, riparian vegetation planting and maintenance, soil stabilization, erosion control, upgrading stream crossings if needed, road out sloping and rolling dip installation where safe and suitable as needed, installing ditch relief culverts and over side drains if prescribed, stabilizing unstable areas, reshaping cut banks, and rocking native-surfaced roads.

5.3 Sediment Control BPTC Measures

Implementing water conservation measures, irrigating at conservative rates, applying fertilizers at conservative rates, applying chemicals according to the label specifications, and maintaining stable soil and growth media should serve to minimize the amount of runoff and the concentration of chemicals in

that water. If irrigation runoff occurs, measures shall be in place to treat/control/contain the runoff. The applicant is water conservative and uses no more than what is required. Irrigation runoff will be contained so that any pollutant is trapped in the ditch relief. Irrigation runoff will be managed so that any entrained constituents, such as fertilizers, fine sediment and suspended organic particles, and other

5.3 Sediment Control BPTC Measures (cont.)

oxygen consuming materials are not discharged to nearby watercourses. The applicant will do his best to ensure that irrigation tailwater is not discharged towards or impounded over unstable features or landslides.

5.4 Spoils Management

Cultivation areas and associated facilities are not located or occurring within 100' of any Class I or II watercourse or within 50' of any Class III watercourse or wetlands, buffers maintain natural slopes with native vegetation, and buffers are of sufficient width to filter wastes from runoff discharging from production lands and associated facilities to all wetlands, streams, drainage ditches, or other conveyances.

Currently, no spoils are stored or placed in or where they can enter any surface water or pollute nearby lands. Any and all spoils shall be adequately contained or stabilized to prevent sediment delivery to surface waters. Any and all spoils generated through development or maintenance of roads, driveways, earthen fill pads, or other cleared or filled areas have not been side cast in any location where they can enter or be transported to surface waters.

If any further spoiling material is required, such as from stream crossing installation or other grading, the discharger shall follow the BMPs in Appendix B of the Order, under Spoil Management. Spoil sites shall be located outside any standard width riparian area (50' for Class III and 100' for Class III) and shall be stabilized and contained as per the BMPs.

6. Invasive Species Control Plan

Invasive plant species must be managed on cultivation sites in Humboldt County, under the current regulations governing cannabis cultivation activities.

The sixteen most harmful weeds in Humboldt County include: Scotch broom (*Cytisus scoparius*), Pampas grass (*Cortaderia jubata*), gorse (*Ulex Europaea*), Himalaya berry (*Rubus discolor*), English ivy (*Hedera helix*), Cape ivy (*Delairia odorata*), European beachgrass (*Ammophila arenaria*), Ice plant (*Carpobrotus edulis*), yellow bush lupine (*Lupinus arboreus*), yellow star thistle (*Centaurea solstitialis*), spotted & diffuse knapweed (*Centaurea maculosa* & *Centaurea diffusa*), bull & Canada thistle (*Cirsium Vulgare* & *Cirsium arvense*), common reed (*Phragmites australis*), Spanish heath (*Erica lusitanica*), and Chilean cordgrass (*Spartina densiflora*). Most potential invasive species are likely limited to species such as Pampas grass, Scotch Broom, Himalayan Blackberry, Italian Thistle, Canada Thistle and English Ivy.

Invasive plant species easily colonize new and disturbed areas with increased traffic. Invasive species should be dealt with immediately by manual/mechanical labor such as removing the plant, root ball and remaining vegetation by hand shovel, cutting, and sawing. Prevention can be encouraged with mulching. Biological controls are not recommended as this is not usually an effective method and can enter streams and waterways.

The applicant employs following methods to help prevent the introduction and spread of invasive species.

- Cleans outdoor recreation gear
- Not releasing any unwanted pets or fish into the wild
- Identifying the most troublesome invasive species, avoid spreading them, and trying to control them.
- Using only native plants that are appropriate for the region.
- Cleans all machines before and after use.
- Avoid disturbing natural areas whenever possible.
- Remove any invasive plant species using the hand pulling method to mitigate regrowth and the spread of seed.

If any of these invasive species are encountered, the applicant will use the hand pulling method to remove the invasive species, while mitigating regrowth and preventing the spread of seed. All Hand pulling of invasive species will be done wearing gloves and protective clothing. The site will be monitor regularly for invasive species.

The following Invasive Species occur in Humboldt County. This list is being provided for easy referral to identify potential species. This is not a representation of the actual site.



French and Scotch Broom (Genista & Cytisus spp.) With many roadside and grassland populations scattered throughout Humboldt County, brooms threaten to rapidly convert productive grasslands to unproductive shrub stands. Brooms are easily identified as yellow-flowered shrubs with small or no leaves.

Pampas / Jubata Grass (Cortaderia spp.) Present throughout Humboldt County, Pampas grass alters native shrub, grass and post-logging forest lands by excluding native plants. It is easily identified by its tall, feather-like seed stalks. Difficult to pull once large, plants are better removed when small.



Common Gorse (Ulex europaea) An invader of native coastal prairies, this shrub is most easily identified by its long, sharp spines, fuzzy foliage, and yellow flowers. Like brooms, this plant threatens to change diverse, native grasslands to dense, single species stands of shrubs. The plant's flowers are a deep yellow color.



Himalaya Berry (Rubus armeniacus), the Himalayan blackberry or Armenian blackberry, is a species of *Rubus* in the blackberry group *Rubus* subgenus *Rubus* series *Discolores* Focke. It is native to Armenia and Northern Iran, and widely naturalised elsewhere



English and Cape ivy (*Hedera* spp. & *Delairea odorata*) These invasive vines climb over and cover native plants and trees growing in shaded places. Ivies will smother and weigh down trees and will carpet over a previously rich forest floor.



European beachgrass (*Ammophila arenaria*) is a clumping perennial grass (family Poaceae) found in coastal dune systems from Santa Barbara County north. European beachgrass grows more densely than native American dunegrass trapping passing sand and creating steep dunes. This stops new sand from reaching interior dunes, changing the structure and ecology of dune ecosystems. Native plants often cannot compete with dense stands of European beachgrass.



Iceplant (*Carpobrotus edulis*) is a ground-hugging succulent perennial that roots at the nodes, has a creeping habit, and often forms deep mats covering large areas. Shallow, fibrous roots are produced at every node that is in contact with the soil.



Yellow bush lupine (*Lupinus arboreus*) An invader of coastal dunes, this plant overwhelms diverse native dune flowers and enriches the soil, paving the way for invasive annual grasses. It is easily identified as the shrub in the dunes with the many bright yellow spikes of flowers.



Italian, yellow star, Canada, and bull (*Centaurea* & *Cirsium* spp.) This suite of invasive thistles infests native grasslands, roadsides and fields. These species displace native plants and are often noxious to native wildlife and livestock.





CanadaThistl



Bull Thistle

Spotted knapweed (Centaurea maculosa) is a biennial or short-lived perennial with a deep taproot. The taproot forms a new shoot each year. Early in the season, the plant appears as a rosette, a leafy prostrate plant. Its rosette leaves develop on short stalks at the base of the plant. They are grayish green and deeply divided into oblong lobes.



Spotted Knapweed

Spanish heath (*Erica lusitanica*) While this low woody shrub is native to Europe, it now grows here in open, coastal areas with sandy soils. The shrub's flowers appear as many pinkwhite bells hanging on branches with soft, needle-like leaves.



Common reed (Phragmites australis) More invasive strains originated in Europe. Invasive European strains probably introduced during the 1800s Crowds out native species to prevent growth.



Chilean Cordgrass (Spartina densiflora) a dense-flowered cordgrass is a **rhizomatous perennial grass** (family Poaceae) found in salt marshes in Humboldt Bay and San Francisco Bay. Dense-flowered cordgrass may have been introduced to Humboldt Bay from Chile by lumber ships in the 19th century.

Chilean Cordgrass

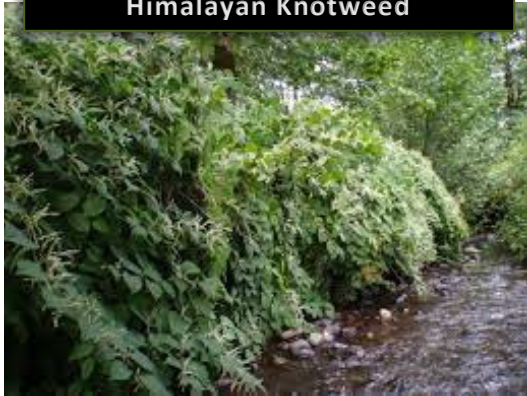


Japanese and Himalayan knotweed (*Polygonum* spp.) Invasive knotweeds can grow from very small amounts of leaf or stem, increasing the chance that plants growing on stream banks may aggressively expand and outcompete native plants.

Japanese Knotweed



Himalayan Knotweed



7. Microbusiness Materials Management Plan

7.1 Petroleum Based/ Fuel Products

All fuel products are stored in approved containers inside a locked shed with secondary containment. Gasoline and mix for gardening equipment is stored in 2-gallon and 5-gallon Gasoline containers. Propane is utilized for the residence and is stored in a Gas company provided storage tank.

7.2 Procedures for spill prevention and cleanup

Spills shall be cleaned up immediately following discovery. Spills shall be cleaned up using proper material to soak up hazardous materials. Spilled materials will be put into proper container, labeled, and transported to a facility that will take the materials. A spill kit will be maintained on site.

7.3 Petroleum Product BPTC Measures

Petroleum products and other liquid chemicals, including but not limited to gasoline, and oils shall be stored to prevent their spillage, discharge, or seepage into nearby soils or receiving waters. Storage containers will be of suitable material and construction to be compatible with the substance(s) stored and conditions of storage such as pressure and temperature. These materials are used for generator, weed whacker, lawn mower and other garden tools maintenance and use. All five-gallon gasoline cans are stored with secondary containment inside of generator shed or in garage on flat, stable areas. The applicant will implement spill prevention, control, and countermeasures (SPCC) and will There are no underground storage tanks on the property.

7.4 Fertilizer

Fertilizer and other cannabis feeding supplies are stored in nutrient shed. The nutrient shed has a raised wooden flooring with a plastic covering for secondary containment of possible spills and leaks. Gloves, fresh water, and soap are also next to feeding tank with stored items.

7.5 Fertilizer Usage

Fertilizers are used in accordance with package directions or from top dressing with soil amendments compost tea recipes. All gardening practices are guided toward biodynamic and organic preparations. All fertilizer stored in original container with labels intact. Weekly visual inspections are done to ensure all containers are viable and not leaking.

7.6 Fertilizer Types

All fertilizers qualify under Clean Green Certificate Program - *Non-Liquid Amendments* -Stutzman's chicken manure, Biochar, Peruvian Seabird Guano, Earthworm Castings, Bat Guano, Organic Steer Manure, Omri listed Compost, and Diatomaceous Earth.

7.7 Pesticide and Agricultural Chemicals

Prevention and management of pests achieved through companion planting of non-invasive plants, nematodes, biodynamic farm preparations, diatomaceous earth, organic and legal pesticides, and visual inspection with hand removal of infested plants.

7.8 Pesticide and Agricultural Chemical Storage Area

Pesticides and agricultural chemicals (fungicide and rodenticide) are stored in a secure location under roofed structure with secondary containment, the nutrient shed in this case. Pesticides and agricultural chemicals are stored in an orderly fashion on shelves and on the floor with original labels per manufacturers recommendations. The area is neat, orderly, and includes a table with measuring devices for calculating and mixing chemicals.

7.9 Measures to protect watershed

All spraying of plants for any type of pest control, mildew/mold control or foliage feeding is done when winds are at 0 and sprayed directly onto plants without over spray. No generators or household projects of any sort happen within 200 ft feet of the watershed. No pumping or dumping ever occurs in watershed. All fertilization of plants is done while I am monitoring it. These tanks hold 300 gallons. The fertilizer system is piped into drip irrigation system propelled by gravity. This process is always monitored. Same for greenhouse crops, the food comes from a 50-gallon barrel and is always fed with supervision.

7.10 Trash/Refuse

Refuse and garbage shall be stored in a location and manner that prevents its discharge to receiving waters and prevents any leachate or contact water from entering or percolating to receiving waters. All trash and recycling are stored in cans with lids on a stable, flat area. The cans are secured to exclude wildlife and prevent discharge or contact with water or receiving waters. Garbage and refuse shall be disposed of at an appropriate waste disposal location. All garbage and refuse are disposed of at an authorized municipal waste transfer station. It will be taken to Redway Transfer station by personal vehicle, i.e. truck, 1-3 times per week depending on garbage accumulation.

7.11 Solid Waste/ Recycling

Solid waste and recyclables on the property will not be stored or collected. They will be taken to Redway Transfer station by personal vehicle, i.e. truck, 1-3 times per week depending on garbage accumulation. All soil will be reused and never dumped. Garbage from the grow is bags from amendments and fertilizer containers. All items will be cleaned out properly into a leach field or garden area, recycled if possible and if not removed to the transfer station. No garbage is stored outside or unattended where animals can access.

Solid Waste and Recyclables Disposal

Redway Transfer Station

Recycling center in Humboldt County, California
Conservation Camp Rd.
Redway, CA 95560

707-923-3944

<https://www.recology.com/recology-eel-river/redway-transfer-station/>

8. Pest Management Plan

This Pest Management Plan (PMP) was prepared to comply with Department of Cannabis Control/California Department of Food and Agriculture (CDFA) 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 (DPR) and the Humboldt County Agricultural Commissioners (CAC) enforcement the use and sale of pesticides under Divisions 6 and 7 of the California Food and Agricultural Code (FAC), and Title 3 of the California Code of Regulations (CCR).

8.1 Cultural Pest Management Control Methods

The applicant utilizes crop isolation, cultivations beds with optimum plant density, vegetative stripping, and spacing to manage pests. A buffer around the cultivation beds is used as further means of isolation from the surrounding environment. Pest repellent companion plant species are also used in the vicinity such as marigolds, red Amaranthus, dill, cilantro, basil, chrysanthemum, and rosemary.

The applicant performs routine ongoing maintenance activities for management of pests including, pruning, defoliation, thinning and topping. Irrigation and drainage is designed to eliminate standing water and runoff/pooling. Sanitation facilities are designed and located to reduce pest attraction. Additional maintenance activities include crop residue destruction, maintenance of clean cultivation bed borders, and weed control. The timing of harvesting is also used to reduce exposure to powdery mildew infestations. Prevention and management of pests achieved through companion planting of non-invasive plants, nematodes, biodynamic farm preparations, diatomaceous earth, organic rosemary and thyme spray, ladybugs, Safer Soap Sulfur Spray 3-1 and visual inspection with hand removal of infested plants.

8.2 Physical/Mechanical and Biological Pest Management Control Methods

The applicant utilizes physical/mechanical and biological pest management control methods. The table below contains potential pests and optional physical/mechanical and biological pest management control methods. Please note pest management options will be employed depending on conditions and circumstances.

8.3 Table 1: Physical/Mechanical and Biological Pest Management Control Methods

Pest or Disease	Physical/Mechanical Practices	Biological Practices
Spider Mites	Keep dust down by watering off plants (if dust is a problem)	Release predatory mites
Broad Mites	Inspect plants; disinfest or dispose of infested plants	Release predatory mites and six-spotted thrips
Russet Mites		Release predatory mites
Whiteflies	Hang up yellow sticky cards, Use	

	reflective plastic mulch	
Thrips	Hang up yellow or blue sticky cards	
Aphids	Hang up yellow sticky cards (alates), Hose off plants	
Leaf miners	Remove older infested leaves	Release Diglyphus parasitoids
Cutworms	Use pheromone traps to detect adults. Remove weeds, which serve as a reservoir for cutworms and other noctuidae	
Flea Beetles	Use reflective mulches Plant trap crops (e.g., radish or Chinese mustard)	

8.4 Chemical Pest-Management Control Methods

The following table contains a list of all the chemicals will be used for pest management. The active ingredients are exempt from residue tolerance requirements and either exempt from registration requirements or registered for a use broad enough to include use on cannabis.

8.5 Table 2: Chemical Pest-Management Control Methods

Pest or Disease	Pesticide Active Ingredient	Pesticide
Mites, powdery mildew, leafhoppers, aphids, whiteflies, moth larvae	Soybean Oil (39%), Sodium Lauryl Sulfate(19%), Citric Acid, and Isopropyl Alcohol	Green Cleaner Spider mite Miticide
Mites, powdery mildew, leafhoppers, aphids, whiteflies, moth larvae	Soy Oil, Peppermint Essential Oil, Citric Acid, Plant Based Surfactant (Soap), Alcohol, Sodium Citrate.	Lost Coast Plant Therapy
Mites, powdery mildew, botrytis and other pests, and fungal/mildew	Thyme Oil 14%, Clove Oil 10%, Garlic Oil 9%, Peppermint Oil 4%, Corn Oil 3%, Geraniol 3%, Citric Acid 2%, Rosemary Oil 2%, 53% Filtered Water, Soap, Isopropyl Alcohol, and Vinegar	Trifecta Crop Control

8.6 Pesticide and Agricultural Chemical Storage Area

Pesticides and agricultural chemicals (nutrients) are stored in a secure location under a roofed structure. Pesticides and agricultural chemicals are stored in an orderly fashion on shelves and on the floor with original labels per manufacturers recommendations. The area is neat, orderly, and includes a table with measuring devices for calculating and mixing chemicals.

8.7 Pesticide Training and Compliance Activities

The Applicant shall undertake the following:

1. Apply for an Operator Identification Number from the Department of Pesticide Regulations.
2. Staff responsible for mixing and application of pesticides will be trained and certified as a Private Applicator.
3. Written Pesticide Training Program will be prepared and utilized at the site.
4. Hazardous Communications Program for Pesticides will be developed and available for all cultivation staff to review.
5. If pesticides used have requirements for respiratory protection Respirator Protection Plan will be developed and implemented at the cultivation site.
6. The Cannabis Waste Management Plan lists the location of hazardous waste disposal and shall hold all records of discarding at a licensed facility.

8.8 Rodents

Rodent control is limited to hardware cloth that lines the beds, noise activators, Tanglefoot Brand coating paste, and cayenne/cinnamon spray. Rodenticide supplies are stored in a secure location under a roofed structure. Rodenticide supplies are stored in the shed in an orderly fashion on shelves and on the floor with original labels per manufacturers recommendations.

8.9 Mold and Mildew

Mold and mildew pathogens controlled with sulfur, Actinovate, Safer Brand Garden Fungicide and visual inspection with removal of infected vegetative matter. Fungicides and other cannabis preventive and treatment supplies are stored in the shed, in an orderly fashion on shelves and on the floor with original labels per manufacturers recommendations.

9. Cannabis Waste Management Plan

9.1 Integrated Waste Management Plan

CERCC requires that the project comply 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 the CWMP to comply with the CERCC, CIWMA, and other 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, CERCC, and CWMP. "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.

9.1 Integrated Waste Management Plan (cont.)

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, CERCC, and CWMP.

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.

9.2 Tracking, Records, and Inspections

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

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 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.

9.3 Internal Waste Management Policies

The following waste management policies shall be implemented to ensure compliance with the CIWMA, CERCC and, CWMP:

A. The CWMP shall always be retained on-site. 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.

9.3 Internal Waste Management Policies (cont.)

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

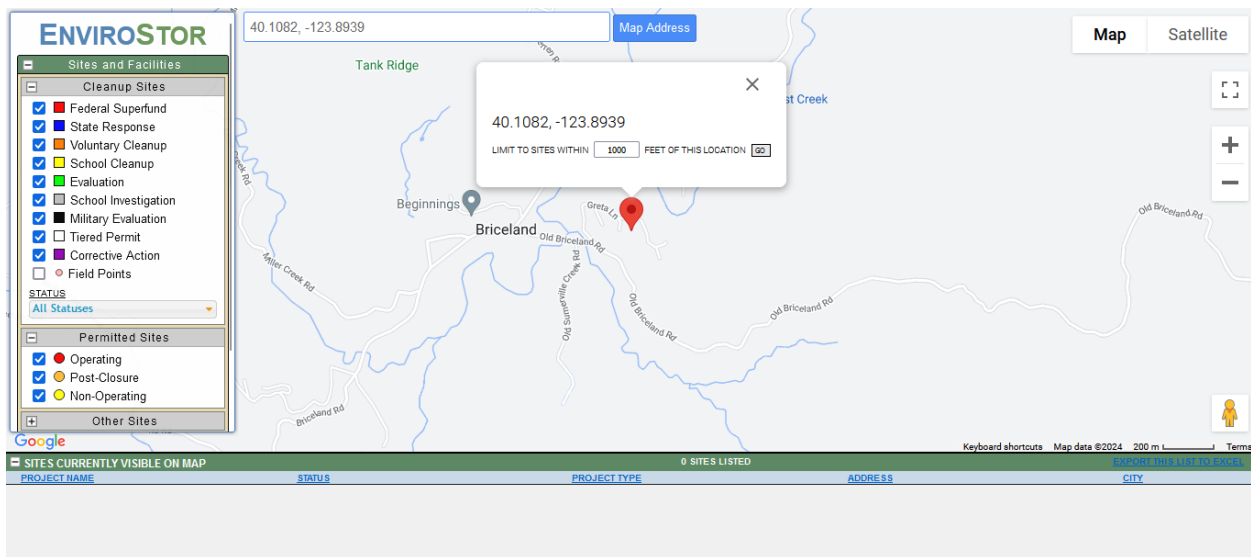
G. Every effort shall be made to use to reduce the amount of cannabis waste sent to landfills by on-site composting and reuse.

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.

10. Hazardous Waste Statement/ Site Assessments

This parcel 220-241-017 or otherwise known as 7777 Old Briceland Rd. Briceland, CA 95542 has not been used to store Hazardous Waste. This was confirmed through the Envirostor Database.



11. Domestic Wastewater Plan

This project will be served by an on-site domestic wastewater disposal system with ADA compatible toilet located inside processing/distribution/non-storefront retail sales building. Wastewater disposal System and building will be commercially permitted through Humboldt County.

12. Soils Management Plan

12.1 Cultivation Soils

All soil from cultivation site will be reused and never dumped. Reused meaning the applicant tills the soils in place in the garden areas. No soils are removed or transferred to other parts of the property. Applicant amends the garden soils every year with basic amendments. Protection from overuse of inputs and reuse of these soils shall be a key component of operations.

Operations will protect the resources through the following means:

The Site management plan will be implemented, Cultivations will occur in beds, air pots, or in the ground. Mixing, tilling, and amending of soils will occur within the receptacles. Composting is in a secure dedicated area. Vegetative materials will be chipped back into the compost pile. Cover crops will be utilized when not in cultivation for a month or more to reduce soil loss.

Garbage from the cultivation is limited to bags from amendments and fertilizer containers. All items will be cleaned out properly into the garden area, recycled if possible and if not removed to the transfer station. Cultivation-related wastes including, but not limited to, empty soil/soil amendment/fertilizer/pesticide bags and containers, empty plant pots or containers, dead or harvested plant waste, and spent growth medium shall, for as long as they remain on the site, be stored at locations where they will not enter or be blown into surface waters, and in a manner that ensures that residues and pollutants within those materials do not migrate or leach into surface water or groundwaters.

13. Processing Plan

All cannabis from cultivation licenses shall be moved to the distribution license and to the distribution center on this parcel. All cannabis will be dried, cured and processed for retail from the distribution license and distribution center.

13.1 Harvest

Cannabis will be harvested using gloves and clean tools. All cannabis will be hung to dry in the drying building on-site (see site map). Dehumidifiers and fans will aid drying in the building. Cannabis will be dried for 10-21 days on lines in these areas depending on weather. The rooms 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.

13.2 Curing

Curing will take place after cannabis is dried on the lines. Cannabis will be visually checked for mold then placed into plastic totes for (2) weeks to two (2) months for curing. During this time the bins will be checked for mold and moisture consistency. Curing cannabis will be stored in processing center on-site. Moldy or defective cannabis will be removed and destroyed using county and state approved procedures for holding and destroying unwanted product.

13.3 Processing

Cannabis Trimming, trimming will occur as cannabis becomes ready from curing process. Trimming will physically take place in processing center with plenty of ventilation and fresh air or outside when weather permits. The applicant intends to trim with the aid of a trim machine and will hire 1-3 independent contractors with a processor's license to help. Processed cannabis will be bagged into turkey bags or sealed bags to be held until distributed or sold. 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.

13.4 Processing-Employees/Contractors

The applicant will need help, so employees/contractors will be hired to help in their respective fields. Applicant has 2 full time employees and utilizes an additional 4-6 seasonal employees provided by Dark Star Staffing as needed. Maximum number of employees on site is 8. Employees/contractors will have access to parking, spacious work zone, clean supplies for task, hand washing areas with soap, bathroom with sink and flushing toilet and break area. The break area has a stove, refrigerator, and ample counter space for all meal preparation. All areas are 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. 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. Workers will commute daily, there are no worker sleeping facilities planned. Drinking Water for workers is supplied by the well. See site plan. Workers are to carpool to property using as few vehicles as possible. Applicant anticipates only one (1) To two (2) vehicles traveling the road daily.

13.5 Worker Safety Practices

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:

- Employee accident reporting
- Security breach
- Fire prevention

Materials handling policies

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:

Personal protective equipment including gloves and respiratory protection are provided where necessary

Fire extinguisher

First Aid Kit

Snake Bite/Bee Sting Kit

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).

14. Parking Plan

This parcel has two main parking areas. The parking area used by the Microbusiness has three parking spaces including an ADA compliant van space. There is an additional parking area adjacent to the residence that can be used as necessary. This parcel has more than enough parking to accommodate the project. See plot plan for details.

15. Energy Plan

All energy needs associated with this project is provided by PG&E with a generator for emergency back-up use. PG&E acquires 39% of it's power from renewable resources. The applicant is dedicated to utilizing as little energy as possible in association with this project. Processing/Distribution/Retail space is primarily utilized during the day to reduce power consumption from lighting. Energy efficient packaging machines will be utilized.

16. Security Plan

This parcel is behind a gate that is always locked. There is a camera system hooked up to the processing/distribution retail building that is monitored 24-7 by the applicant. The applicant resides on-site. No cannabis products or items of value are left in visible areas.

17. Distribution/Transportation Plan

17.1 Distribution Plan

The applicant is applying for a microbusiness license that will include cultivation (existing), manufacturing, Distribution, and Non-storefront Retail Sales. Distribution of cannabis will occur after product is dried by the cultivator. The product will then be transferred to the Distribution license and will be processed, manufactured, packaged, labeled, and tested in compliance with distribution regulations.

Cannabis will be processed, manufactured, packaged, labeled, and tested in the Distribution licensee's processing/ packaging building. Packaged cannabis will then be stored in a climate-controlled distribution storage room within the applicant's existing, commercially permitted processing/Distribution building. Packaged cannabis will include flower, pre-rolls, pressed rosin, and kief. All cannabis will be tested by a licensed third-party testing facility. The cannabis will then be stored in the climate-controlled room until it is sold to a licensed retailer or to another distributor.

Distribution license will intake all cannabis from licenses owned by Old Briceland Holding Company LLC. The applicant may decide in the future to take on other clients and distribute their product as well, but for now, will only be handling the licenses owned by Old Briceland Holding Company LLC.

All cannabis will be transferred through the metrc system and inventoried regularly. Cannabis products that do not pass compliance testing will be returned to the cultivator or remediated, if possible. All cannabis products within the distribution building will be stored separately by batch and identified with corresponding metrc tags.

Products will be packaged and labeled pursuant to section 26120 of the MAUCRSA.

17.2 Transportation Plan

All vehicles transporting cannabis will have a valid motor vehicle carrier permit pursuant to Chapter 2 (section 34620) of division 14.85 of the California Vehicle Code. All cannabis products will be transported inside or within a vehicle or trailer and will not be visible or identifiable from outside of the vehicle. All cannabis products will be locked in a box, container or cage that is secured to the vehicle.

Transportation vehicle will not be left unattended or left parked overnight in a residential area. The transportation vehicle will be equipped with an alarm system. Motion detection, and panic buttons may also be used.

Transportation vehicle will travel the shortest possible route to its destination and will minimize any stops by making sure that the vehicle is fueled up and ready before being loaded with cannabis products. Transportation vehicle will only be used to transport cannabis goods while being used for distribution.

All licensing, registration, and insurance information for transportation vehicle will be provided to the BCC, including make, model, vin, and license plate number. No person under the age of 21 will be allowed in the transportation vehicle while it is in use.

Only the licensee or an employee of the licensee will be allowed in the transportation vehicle when in use. Transporter will generate a manifest through the metrc system prior to transporting any cannabis products. Manifest will remain with driver until the product is delivered to its destination.

Transportation vehicle will be tracked during deliveries by using a tracker app that is equipped on the driver's phone during all deliveries. The driver will be instructed not to deviate from intended route at any time, except for in an emergency.

18. Light Pollution Control Plan

Entire greenhouses are blacked out with black plastic to prevent light leaks. Applicant guarantees that there are no light leaks coming from the greenhouses. Manufacturing, distribution and non-storefront retail take place inside the existing commercially permitted building on-site. All outside lighting is downcast and shielded and would not be visible from neighboring parcels.

19. Retail Sales Plan

This application is for non-storefront retail within the microbusiness on the state license. Non storefront retail sale will include sales directly to retailers, as well as wholesale sales to distribution companies. It also includes farmers markets, festivals and other opportunities for sales that are not a traditional storefront retail shop.

All cannabis products would be sold in accordance with the state law governing the type of sale. Old Briceland Holding Company LLC will verify that all retail sales facilities are properly licensed, and all transfers of cannabis product will occur within the Metrc system.

Old Briceland Holding Company LLC will reach out and develop relationships with licensed retailers that are willing to sell Old Briceland Holding Company LLC's cannabis products. Old Briceland Holding Company LLC will then take orders from licensed retailers, package and label the products as needed,

19. Retail Sales Plan (cont.)

and deliver the cannabis products to the retail location. Old Briceland Holding Company LLC will then collect payment for sold products upon delivery. All sales will be payable upon delivery unless other arrangements are made with the retail sales location in advance.

Sales that occur at an event type setting ie; festival or farmers market, all sales will be recorded into metrc and all local and state laws will be followed in the area of the event. This type of sale would require the application and approval of an additional DCC temporary event license.

20. Manufacturing Plan

Old Briceland Holding Company will Harvest and immediately freeze some products that are slated for manufacturing. Some cannabis will be dried to make into water hash. All products slated for manufacturing will then be tested to ensure compliant product. Once testing has been completed, the cannabis will be pressed with a commercial cannabis rosin press to extract the oils from the plant to be made into rosin or washed with water and ice to create water hash products. Old Briceland Holding Company will not use any solvents during the manufacturing process, the cannabis will simply be pressed or washed to extract the THC terpenes, and resin of the plant. Once the plant material has been pressed or washed to extract the rosin and hash, it will be composted in the designated compost area. Equipment required for this process includes a commercial freezer(s), Electric/Hydraulic Rosin Press, specialized rosin extraction bags, and specialized “bubble bags” and hash washing machines for making water hash. Once the rosin and hash products are manufactured it will be packaged into compliant packaging and will be tested again for quality assurance before it is distributed to retail facilities and other distributors.

21. Microbusiness Plan

Old Briceland Holding Company LLC is applying for a Microbusiness license to add manufacturing, distribution and non-storefront retail to their already approved special permit for cultivation.

Cultivation under this microbusiness license would be limited to 9960ft² of the current active large mixed light State license (CCL23-0000414)

Microbusiness would also include manufacturing of water hash and pressed rosin, distribution, including processing, packaging, and labeling of cannabis flower, pre-rolls, and kief product without volatile means of extraction. Cannabis products would then be held in the distribution license until tested by a licensed testing facility, before being transferred to other distributors or retailers. Microbusiness activity to take place in the applicant’s existing commercially permitted processing building on-site. Processing building is a multi-room structure with an ADA compatible bathroom.

The microbusiness would be run by the applicant, and two full time employees. Power for the microbusiness comes from PG&E and water use would only be ancillary, for drinking, handwashing, and bathroom, and would be provided by the groundwater well.

21. Microbusiness Plan (cont.)

Processing, manufacturing, packaging, labeling, and pre-rolling will take place in one room of the building, while storage would occur in another room of the building, which is climate controlled, to keep the stored cannabis at the proper temperature. (See site map)

Distribution activity will also include arranging for and facilitating testing of cannabis product by a licensed third-party testing facility. All cannabis products once tested will remain in the climate-controlled distribution storage area until sold to licensed retailers.

The processing/distribution building is equipped with commercial locking doors, security cameras and is alarmed. Security camera system is equipped with a recording system that stores up to 90 days of recorded data.

Transportation of cannabis for distribution will only occur in an enclosed vehicle with an alarm and will be transported in such a way that cannabis products will not be visible from outside the vehicle. Vehicle is unmarked. Cannabis will only be transported by the applicant or an employee of the Microbusiness.

Retail Sales will only be conducted by delivery. The licensee or employee of the licensee will deliver cannabis goods directly to a licensed retail facility, or to another licensed distribution facility. All distribution, transportation and sales will be tracked through the Metrc system. Metrc records will be kept in a safe place for a term of seven years.