OLD BRICELAND HOLDING COMPANY, LLC
CULTIVATION AND OPERATIONS PLAN

Prepared for:
HCPD Application # 10697
APN: 220-241-017-000
7777 Old Briceland Road, Garberville CA
P.O. Box 1250 Redway CA 95560

Section I : Project Information

Project title: Old Briceland Holding Company, LLC Special Permit : APN 220-241-017; Case Number: PLN-10697-ZCC (Special Permit for 7,196 square feet of existing cultivation and 2,804 square feet of new cultivation). In addition to the Special Permit for 10697, APN 220-241-017 is a donor site for the retired, re-mediated, and relocated (RRR) cultivation site from Humboldt Child Farms (Shawn Parker) under App # 12786 APN: 534-193-004, for 20,000 square feet of cultivation, for the project site total cultivation to be 30,000 square feet of commercial cannabis production.

Lead agency name and address: Humboldt County Planning & Building Department , 3015 H Street, Eureka CA 95501-4484. Phone (707) 445-7541; Fax (707) 445-7446.

Contact person and phone number: Steven Santos, Senior Planner (707) 268-3749. Email: ssantos@co.humboldt.ca.us.

Project Location:. The project site is further identified as Humboldt County Assessors APN 220-241-017. The project is located in Humboldt County, in the Briceland area, on the North and south sides of Old Briceland Road, at the intersection of Old Briceland Road and Greta Lane, on the property known as 7777 Old Briceland Road, Briceland.

Project sponsors name and address:

Applicant	**Owner**	**Agent**
Old Briceland Holding Company, LLC	Rama Boyd	Humboldt Logistics, LLC
7777 Old Briceland Road	PO BOX 1250	PO BOX 457
Garberville CA 95560	Redway CA 95560	Scotia CA 95565

General plan designation: RA20, Humboldt County General Plan (2017).

Zoning: Unclassified (U)

Project Site History: The project site is located in the area of Old Briceland Road, off of Briceland Thorn Road outside of Redway California. In recent years, the site was used for commercial cannabis cultivation and agricultural activities (cultivation and on-site processing). The southern west portions of the project site remain undeveloped and are covered in grasses and small shrubs.

The project site is located adjacent to properties that were historically used for industrial and agricultural activities (for example, logging and grazing) and rural residential uses. The project site is outside any Urban Services Boundaries and City Spheres of Influence and Planning Area.

SECTION II: Cannabis Permits

This Cultivation and Operations Plan has been prepared for Old Briceland Holding Company, LLC which seeks approval of the Special Permit of 10,000 square feet of commercial cannabis cultivation, and a Zoning Clearance Certificate within the RRR program for 20,000 square feet of commercial cannabis cultivation, totaling 30,000 square feet of mixed light tier 2 commercial cannabis production, at 7777 Old Bricleand Road, (APN 220-241-017), to the west of the town of Redway.

Phase 1 of the project (PLN-10697) proposed use of the existing 7,195 square feet of commercial cannabis activities on site for cannabis processing and cultivation. Due to restoration work within a streamside management area regarding the removal of ancillary cultivation items, these activities required Special Permits and were given an interim permit pursuant to the Humboldt County Commercial Medical Marijuana Land Use Ordinance (CMMLUO), Section 314-55.4.1 et seq, specifically Section 314-55.4.8.11.

At the peak of Phase 1 activities, operations at the site consisted of processing and cannabis cultivation. There are (3) three full time cultivation staff, (5) full time processing staff, and (3) three part time clerical staff. Currently there is onsite activity and a valid state license for the processing and cultivation and transport of activities onsite. Table 1 summarizes the status of the State cannabis licenses for the approved Phase 1 interim permit activities.

Table 1: Phase 1 State Cannabis Licenses

Business Name	License Type	License Number	Date Active
Old Briceland Holding Company, LLC	Medium Mixed Light Tier 2	CCL18-0002157	04/02/2018
Old Briceland Holding Company, LLC	Distribution Transport Only	C13-0000206-LIC	02/10/2022

Phase 2 of the project (App 10697) proposes an additional 2,804 square feet of new cultivation and 20,000 square feet of mixed light tier 2 commercial mixed light tier 2 cultivation through the Humboldt County retired, re-mediated, relocated (RRR) cultivation site from Humboldt Child Farms, (Shawn Parker) under App #12786 APN 534-193-004.

The total cultivation footprint on the Applicants parcel will be 30,000 square feet of flowering mixed light tier 2 canopy. To support cultivation operations, a total of 3,000 square feet of accessory nursery space will be utilized onsite. There will be structures onsite that will be used for dual purpose of flowering, nursery, and propagation at certain times of the year. The total square footage of structures onsite for all office use, processing, cultivation, and ancillary use of commercial activity is 41,559 sf that will be impacting the subject parcel. The project site is zoned unclassified (U) and the County Planning Department has determined this application is subject to the Humboldt County Commercial Medical Marijuana Land Use Ordinance (CMMLUO), Section 314-55.4.1.

SECTION III : Cultivation Plan

A. Description of Cultivation Activities

The project proposes the use of (14) fourteen mixed light tier 2 greenhouses (including the nursery) that are used for up to 30,000 square feet of cultivation and 3,020 square feet of ancillary nursery. This includes the 500 square feet of ancillary propagation within the main and central office, restroom, and propagation structure.

Each of the (14) fourteen mixed light and nursery greenhouse infrastructure are configured such that the first 8' from the end are unenclosed storage areas (awnings) for storage materials and for storage of light deprivation tarps to be International Dark Sky Standard compliant covers used for covering light supplemented greenhouses after sunset. The "effective" cultivation area for each greenhouse is 8'x24' (192 square feet), which is not constituted for cannabis cultivation within this allotted space in the infrastructure. This is a separate logistics area that is bifurcated by a wall. There are two separate spaces flush with each other, that is specifically dedicated to the storage material space within the cultivation houses and house an eyewash station and record storage area specified for immediate utilization and spray, water, and waste logs for that particular cultivation house. See Appendix 11 – Photos of Awnings in addition to cultivation infrastructure for utilization of management materials.

The nursery will provide plants for onsite cultivation. The nursery will also include research and development activities including testing strains and phenotypes for yields, terpenes, and cross breeding with a focus on Old Briceland Holding Company genetics. The main nursery is ML2 – Nursery structure, on the site plan, see Appendix A.

There are multiple uses within the mixed light greenhouses, where the applicant will use some of the flowering canopy as dual purposed for propagation in addition to flowering canopy. The activities of dual-purpose propagation that will occur in mixed light greenhouses ML1 and ML3 which are seasonally used for dual propagation and flowering cultivation uses.

(2) two generator sheds are pre-existing on site, which allow for proper compliance with secondary containment, fuel storage, and double wall barriers in case of any emergencies with the generators onsite. An exhaust is also installed in these structures for any fuel offsets and no entrapment of diesel odors.

There are (6) six office and storage buildings onsite that are 164 square feet each, totaling 984 square feet of buildings located on the eastern edge of the project site. These are utilized for storage of materials, record retention, METRC, and break resting rooms for on-site employees. The applicant in the future is looking to utilize these for possible cannabis tourism.

(4) Four shipping containers are onsite for regular storage, personal protective equipment storage, dry soil amendment storage, and non-cannabis material storage. These each are 160 square feet (8'x20').

(1) One refrigerated shipping container is kept onsite for harvest storage on the eastern portion of the drying and processing building, for harvest storage that results in 280 square feet (8’ x 35’).

Table 2: Phase 1 – Summary of Existing and Proposed Buildings and Cultivation Areas

Cultivation Activity	Building Footprint (sq. ft)	Building Floor Area (sq. ft)	Cultivation Area (sq. ft)	Nursery Area	Photograph #
ML1 – Mixed Light / Dual Use Nursery	35’ x 96’	3,360	3,360		Photo 13
ML2 – Nursery	35' x 72’	2,520		2,520	Photo 10, 11, 12
ML3 – Mixed Light / Dual Use Nursery	35’ x 75’	2,625	2,625		Photo 3, 4, 8, 9, 17
ML4 – Mixed Light	24’ x 80’	1,920	1,920		Photo 1, 4, 8, 9, 17
ML5 – Mixed Light	24’ x 95’	2,280	2,280		Photo 1, 3, 8, 9
ML6 – Mixed Light	24’ x 100’	2,400	2,400		Photo 1, 3, 8, 9
ML7 – Mixed Light	24’ x 100’	2,400	2,400		
ML8 – Mixed Light	24’ x 100’	2,400	2,400		
ML9 – Mixed Light	24’ x 100’	2,400	2,400		
ML10 - Mixed Light	24’ x 86’	2,064	2,064		
ML11 – Mixed Light	24’ x 89’	2,136	2,136		
ML12 – Mixed Light	24’ x 83.3’	2,000	2,000		
ML13- Mixed Light	24’ x 76.6’	1,900	1,900		
ML14 – Mixed Light	24’ x 76.6’	1,900	1,900		
Office, Restroom & Propagation Building		1800		500	Photo 2, 18
(6) Office & Storage Buildings	10.3’ x 16	984			Photo 14, 15, 16
Drying, Processing, & Storage Building	45’ x 50’	2,250			Photo 14, 15, 16
Generator Shed 1 & Materials Storage	50’ x 54’	2,700			Photo 8, 19, 20,
Generator Shed 2	20’ x 24’	480			Photo 12
(4) Shipping Containers – Ancillary Storage	8’ x 20’	640			Photo 12
(1) Refrigerated Shipping Container – Harvest Storage	8’ x 35’	280			
Storage Shed/ Nutrients & Pump Filtration	10’ x 12’	120			Photo 17
TOTAL		41,559	29,785	3,020	

Table 3: Monthly Schedule of Activities

Month	Cultivation Activity
Jan	Propagation, Breeding, Planting, Storing Water
Feb	Propagation, Breeding, Planting, Storing Water
Mar	Propagation, Breeding, Planting, Storing Water – First Round Harvest
Apr	Propagation, Harvesting, Planting, Reamending soil
May	Propagation, Harvesting, Breeding, Planting, Processing
Jun	Propagation, Harvesting, Breeding, Planting, Processing
July	Propagation, Harvesting, Breeding, Planting, Processing – Second Round Harvest
Aug	Propagation, Harvesting, Breeding, Planting, Processing – Crop Maintenance
Sep	Propagation, Harvesting, Breeding, Planting, Processing – Erosion Control
Oct	Propagation, Harvesting, Breeding, Planting, Processing – Third Round Harvest
Nov	Propagation, Breeding, Planting, Storing Water
Dec	Propagation, Breeding, Planting, Storing Water – Possible 4th Round Harvest

B. Water Sources and Use

The agricultural activities conducted in the existing greenhouses and buildings at the project site (i.e. cultivation and processing) are served primarily by an off stream rainwater catchment and storage pond (GPS coordinates 40.1088,-123.8952), with additional high density poly ethylene tank storage. The oval shaped pond, was completed with engineering oversight, has dimensions 100 feet long by 50 feet wide by 10 feet deep. This equates to approximately 440,000 gallons of capacity. Based upon mean annual precipitation of 64 inches, the pond is expected to fill 75% or 300,000 gallons from rainfall, not counting overland flow. The pond is expected to be full at the end of winter. See attached photo, Appendix 3. Rain collection devices are also installed along nearby greenhouse drainage and terraces.

Based on the Humboldt County Planning Department, Marshall Ranch Revised Draft MND October 2020 two methods were applied to determine an appropriate annual rainfall to utilize for project considerations, to ensure enough clear evidence that sufficient rainwater will be collected to meet the identified project needs. This study was able to co-relate to the location of the proposed project by Old Briceland Holding Company, LLC.

1. Local rain gage data compiled by the Mattole Restoration Council (Figure 1); and
2. Annual rainfall for Briceland, CA based on PRISM Climate Group interpolations (Figure 2).

Based on these two data sources, an annual rainfall of 48 inches was selected as the design precipitation which represents a dry year with precipitation between the 5th and 10th percentile. This “design precipitation” was selected based on the goal that the project function at capacity during 90% to 95% of precipitation seasons. However, it was not desirable to limit the project capacity by designing for the most extreme drought years.

The applicant has (87) Eighty Seven, 5,000 gallon tanks. These tanks will be filled with the rainwater collection system and supplemented by the Redwood Creek diversion when sufficient flow exists between November 15th and March 31st. The total proposed capacity will be 435,000 gallons. These tanks are the secondary irrigation source for all cultivation activities on site.

Applicant will supplement with diversion from Redwood Creek, in addition to the roof top rain collection installed on the roofs of the nearby propagation and storage structure's. The Redwood Creek diversion is registered within the State Water Resource Control Board as SIUR ID# H510875, and California Department of Fish and Wildlife 1600 - LSAA Extension Agreement: 1600-2015-0504-R1. This limited irrigation source abides by all forbearance periods. The applicant is allowed to divert from Redwood Creek at a rate of 5 – gallons per minute with a limit of 300 gallons of water per day for domestic purposes only during forbearance period annually. This diversion will be stored in off stream storage tanks. See attached Appendix 4 – DWR Certificate H100756 Right to Divert and Use Water ; SWRCB and NOA WDID: 1_12CC418809, Appendix 5 – CDFW LSAA Notification No. 1600-2015-0504-R1, Appendix 6 – TRC Work Completion Report – Water Diversion Structure Compliance – January 31st 2022, Appendix 7 – SWRCB Initial State of Water Diversion & Use Redwood Creek – January 2nd 2016, and Appendix 8 – SWRCB Annual Reports for Monitoring and Reporting years 2017-202.

According to the Marshall Ranch Revised Draft MND by Humboldt County in October 2020, Redwood Creek has been monitored by Salmonid Restoration Federation for dry season flows, beginning in 2013. Flow monitoring results for station RC-4, located near Redwood Creek's confluence with the South Fork Eel, is shown in Figure 3. As this figure depicts, dry-season flows in Redwood Creek are extremely low with flows at RC-4 dropping below 5 gallons per minute during each of 2013 through 2018 dry seasons (2019 was anomalously high). Flows at all other monitoring stations throughout the watershed follow similar trends with zero flow recorded at the majority of monitoring stations during most years. Based on this data, the proposed project benefit of 5 gallons per minute of flow augmentation provides a substantial and meaningful increase above current dry season base flow.

In the event, that the Redwood Creek diversion (SIUR ID # H510875) is out of order or no longer in use, the State Water Resource Control Board and California Department of Fish and Wildlife have reviewed a fourth and limited to none irrigation source also abiding by forbearance, within Somerville Creek, as SIUR Application # 436268 which is also listed in the LSAA Extension Agreement: 1600-2015-0504-R1. There is no infrastructure at the diversion point at this time, and this diversion is not being used. See attached Appendix 4 – DWR Certificate H100756 Right to Divert and Use Water ; SWRCB and NOA WDID: 1_12CC418809, Appendix 5 – CDFW LSAA Notification No. 1600-2015-0504-R1, Appendix 6 – TRC Work Completion Report – Water Diversion Structure Compliance – January 31st 2022, and Appendix 8 – SWRCB Annual Reports for Monitoring and Reporting years 2017-2021

The applicant has (2) two groundwater wells onsite, that are used for domestic purposes only. Well # 1 is located at (40.1073,-123.8914) and Well # 2 – Permit # 15/16 -0532 is located at (40.1062,-123.8911) See attached Appendix 2 – Well Completion Reports 1087855 & 1087906. Irrigation is applied at agronomic rates to avoid over watering plants. The applicant uses compost mulch to aid water retention of soils, drip lines are installed when necessary, in

greenhouses, and Applicant uses timers and manual shutoff valves to avoid over watering. Water meters are connected to the irrigation lines to monitor and report water usage.

Applicant anticipates at least (3) three cultivation cycles. During the hot, dry summer and early fall (May 1 to October 31, 184 days) projected irrigation water usage is 3,428 gallons per day. Total water usage for this period is expected to be approximately 630,752 gallons of water. See Table 4 – Estimated Irrigation Water Use for Cultivation Activities and Sources.

Based on the additional later cultivation cycle, Applicant expects to use an average of 2,745 gallons per day during the late fall and winter seasons (November 1 to April 30, 181 days), for a total of 496,845 gallons of irrigation water during this period. See Table 5 – Estimated Irrigation Water Use for Cultivation Activities and Sources.

The annual projected water usage for cannabis cultivation on the property is anticipated to be 1,127,597 gallons. Water meters are installed to track and report total water usage monthly and at the end of the cultivation year.

The (54) fifty four, 5,000 gallon high density polyethylene tank farm that was located on an adjacent property 220-251-034 was relocated onto the subject parcel at the northern portion of the property by the PG&E power drop pole, located at GPS coordinate's (40.1091,-123.8944). This allows all ancillary cultivation accessories to be located on the single subject parcel of the project location at 220-121-017-00. These tanks are being removed out of a streamside management area, and relocated, and the retired location will be remediated within the project. See Appendix 9 – Old Briceland Holding Company Water Lines & Sources Diagram, with color coded routes and explanations of water distribution throughout the subject property.

Table 4: Summary of Water Sources for Project

Water Source	Domestic / Agricultural / Fire	Total Storage (gal.)	Photograph #
Well 1	Domestic	0	
Well 2	Domestic	0	
Rainwater Catchment Pond	Agricultural – Primary Source	440,000	Photo 21
Rainwater Catchment Pond	Fire Suppression	440,000	Photo 21
High Density Poly Ethelene Tank Farm	Agricultural – Secondary Source	435,000	Photo 5,6,7
POD 1 – Redwood Creek (SIUR ID # H510875)	Agricultural – Limited Source	0	
POD 2 – Somerville Creek (SIUR Application # 436268)	Agricultural Limited – Not in Use	0	
TOTAL		875,000	

Table 5: Summary of Water Storage Tanks for the Project for Fertigation, Irrigation, and Domestic Use

Storage Tank Use	Amount of Tanks	Storage Amount per Tank (gal.)	Total Storage on Site (gal.)
Fertigation	4	1500	6000
Fertigation	3	1550	4650
Irrigation	87	5000	435,000
Domestic	1	5000	5000
Total	95 Tanks Total		450,650

Table 6 : Annual Project Irrigation Use

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Creek to Pond	708,270	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	1,041,730	
Creek to Upper Tanks	117,660	117,680	117,680	117,680	117,680	117,680	117,680	117,680	117,680	117,680	117,680	
AG 2" line out	1,419,200	1,469,500	1,535,000	1,586,650	1,647,300	1,709,000	1,782,800	1,853,229	1,898,447	1,944,300	1,961,800	
AG 1' Line out	26,370	32,570	55,080	71,270	81,860	92,790	105,800	118,800	131,810	141,650	153,910	
Domestic Line 1 - Out	15,790	22,130	39,860	45,700	52,360	61,300	70,310	76,340	79,770	83,170	90,940	
Domestic Line 2 - Out	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,370	1,370	
Well to Domestic in 1	9,991,100	9,993,010	9,995,140	9,996,100	9,996,450	9,994,300	9,995,630	9,998,080	9,999,040	9,999,970	790	
Well to Domestic in 2								333,660	357,350	385,200	393,610	
Actual Use												
AG 2" line out	50,300	65,500	51,650	60,650	61,700	73,800	70,429	45,218	45,853	17,500		
AG 1' Line out	6,200	22,510	16,190	10,590	10,930	13,010	13,000	13,010	9,840	12,260		
Domestic Line 1 - Out	6,340	17,730	5,840	6,660	8,940	9,010	6,030	3,430	3,400	7,770		
Well to Domestic in 1	1,910	2,130	960	350	2,150	1,330	2,450	960	930	820		
Well to Domestic in 2								23,690	27,850	8,410		
	64,750	107,870	74,640	78,250	83,720	97,150	91,909	86,308	87,873	46,760		
								Total				
								819,230				

Figure 1: Local Rain Gage Data Compiled by the Mattole Restoration Council

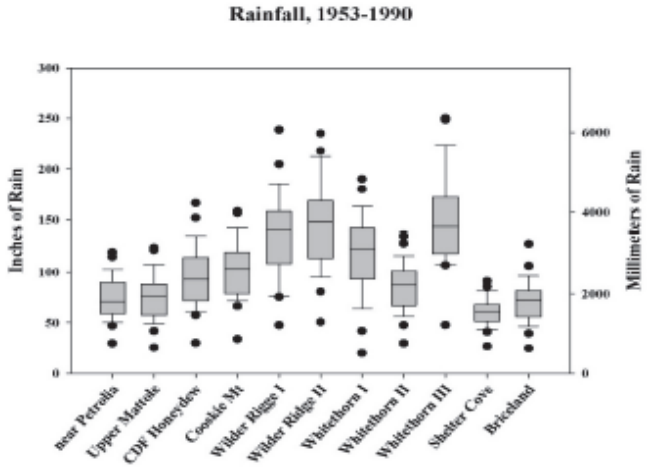


Figure 2: Annual Rainfall for Briceland CA based on PRISM Climate Group interpolations

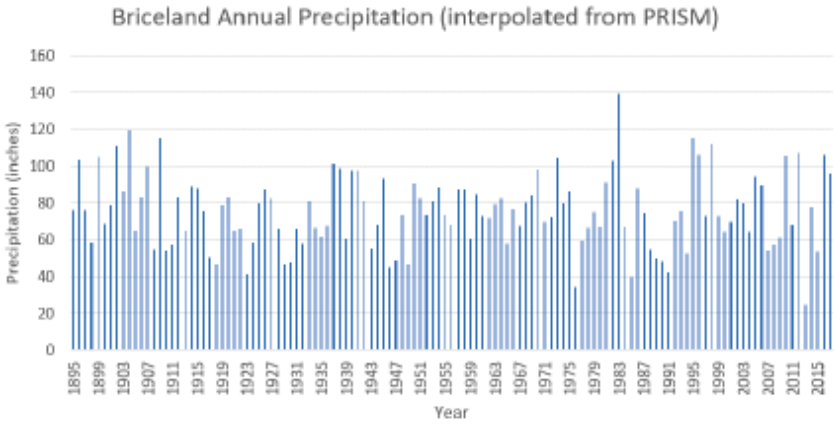
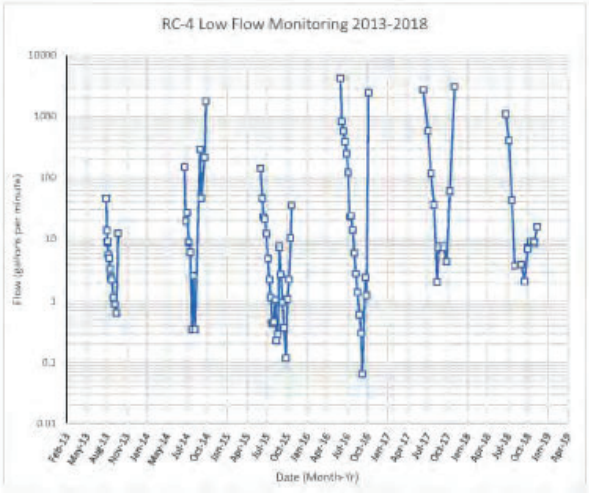


Figure 3: Dry season flow monitoring results for Redwood Creek mainstem near confluence



C. Energy Sources and Use

Beginning in May 2017, the electricity source for Humboldt County transitioned to the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce greenhouse gas emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered over the existing power lines by PG&E (RCEA, 2022). The CCE program procures approximately 47 percent of its power from renewable sources (RCEA, 2021a). In addition, customers can choose to opt up to a premium service called Repower+, which is 100 percent renewable energy at only $0.01 more per kilowatt hour (kWh) (RCEA,2022). RCEA is pursuing the following procurement goals which will further increase the percentage of power from renewable resources for all of its customers – 100% carbon-free electricity by 2025 (RCEA Board goal adopted in 2019) and 100% local carbon-free electricity by 2030 (Board goal adopted in 2016) (RCEA,2021b).

Phase 1: Phase 1 of the project receives electricity from (4) four diesel generators supplying power to the site, which are housed in generator sheds which are equipped with fire suppression equipment and built for sound suppression. All fuel stored on property is in above ground fuel storage tanks with 100% containment pans. Spill kits are available and located adjacent to each generator. The generators are enrolled within Humboldt County CUPA Program, and have been inspected annually by Jon Verbeck. When power becomes available for an upgrade in this specific region of the County, the applicant intends to transition these generators into emergency back up generators for onsite operations. Applicant will ensure compliance that the generator usage does not exceed 60 decibels from the property line for noise generation onsite. See Appendix 12 – Briceland SPCC, Safety Meeting and Training Plan.

Gas service is delivered to the property with (8) eight, 500 gallon existing propane tanks by Blue Star Gas, totaling for 4,000 gallons of propane onsite.

Phase 2: Phase 2 of the project is transitioning the generators to 100% renewable energy to power the project thru a solar power array and a power upgrade which applicant will be enrolled within the Redwood Coast Energy Authority program. It is anticipated that it will take approximately 2-5 years for PG&E's electrical conveyance infrastructure to the site to be upgraded to meet the needs of the proposed cultivation activity. Until the electricity infrastructure upgrades are completed, it is proposed to use the existing enrolled diesel generators to provide electricity to the mixed light tier 2 project.

D. Odor Management

During long term operation of the project, there is the potential to impact air quality due to odors that would be generated by the proposed cannabis cultivation and processing activities. As the current project sits, there is no impact to the parcel or surrounding parcels of odor nuisance within the cultivation or processing activities currently. To address potential odor impacts, an Odor Mitigation Plan will be implemented during the

project operation. Odor minimization measures include, but are not limited to the following:

- The operator will hold frequent safety meetings to train and educate employees on the procedures needed to strictly monitor odor issues.
- Corrective actions to address County verified offsite odor complaints will be identified and implemented to site specific methods to be developed and applied for the next harvest to minimize offsite odor impacts so that they would not result in adverse air quality impacts or conflict with County or State license requirements.

E. Pest Management

Cultivation operations will comply will all pesticide laws and regulations enforced by the California Department of Pesticide Regulation and by the Humboldt County Department of Agriculture. Table 7 lists the pesticide products and active ingredients that are proposed for use during cultivation activities, which are all products that can legally be applied to cannabis in the State of California. Secondary containment totes will be used to further minimize the risk of spills, leakage, and transport. All operators will be sufficiently trained in the storage, use, and emergency containment and cleanup procedures for any pesticides used on site prior to initiation of use. Any pesticides in use will. Be stored consistent with product labeling, in original containers, and used according to labels. Applicant will maintain and keep personal protective equipment required by the pesticide label in good working. All required warning signs will be posted and material safety data sheets (MSDS) will be kept in the area where pesticides are stored. Emergency contact information in the event of pesticide poisoning shall also be posted at the work site including the name, address, and telephone number of emergency medical care facilities.

Table 7 – Pesticide Products for Cultivation Activities

Product Name	Active Ingredient (s)
Lost Coast Plant Therapy	Soybean oil, isopropyl alcohol, citric acid, peppermint oil
Dr. Zymes	Citric acid derived from fermentation
Zerotol 2.0	Hydrogen dioxide, peroxyacetic acid
Neem Oil	Neem Oil

SECTION IV: Operations Plan

A. Hours of Operation

The proposed cannabis facility will operate year-round. The hours of operation will typically be from 6:00 am to 8:00 pm, Monday through Sunday. However, there may be times when the facility operates 24 hours per day during the year. The facility will not be open to the public and will not accept visitors without a specific business purpose.

B. Number of Employees

The number of employees working at the project site will vary depending on the specific activities taking place at any given time. The maximum number of employees at full buildout will be 11 employees. This includes (3) three full time cultivation staff, (5) five full time processing staff, and (3) three part time clerical staff. The facility will not be open to the public and will not accept visitors without a specific business purpose.

C. Staff Screening Process

- Managers, Supervisors, and Drivers will be live scanned through the California Department of Cannabis Control (DCC) with a full background check and fingerprinting and reported to the DCC as an employee of the company.
- Laborers and administrative staff will undergo a criminal background check and be hired on a case-by-case basis if a felony or history of drug abuse is found.
- All employees will fill out an employment application and go through extensive training to maintain professionalism and ensure compliance with standard operating procedures and regulatory requirements.

D. Security

To address potential security issues during the operation of the facility, the applicant has implemented security measures to safeguard the product and prevent nuisance from occurring on the property.

Locked gate: Security gates are installed at main access road and at the single access road. These gates will remain locked during normal operations and only opened for site access. See photographs # 23, 24, 25.

Security cameras: Applicant has installed security cameras around the exterior of the proposed onsite processing facility, cultivation sites, and entrances to the parcel.

E. Waste Management Plan

The plan for disposal of project related solid waste includes managing cannabis waste, facility trash, containers, irrigation tubing, pots and similar containers used for propagation and cultivation, lighting fixtures, tanks, and wiring and related equipment.

Cannabis waste: Cannabis waste generated by the proposed project will be managed by onsite composting and self-hauling to a permitted disposal and/or composting facility that accepts cannabis waste. Onsite composting of cannabis waste material would occur in the compost and used soils storage and reconditing area towards the lower western portion of the parcel.

Cultivation waste: Cultivation related waste includes but is not limited to, empty soil bags, soil amendment bags, fertilizer bags and containers, empty plant pot or containers, dead or harvested plant waste, and spent growth medium. These materials will, for as long as they remain on site, be stored in locations where they will not be inputted 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 ground waters.

Soils Management: Soils used for cultivation will be re-fortified after harvest so that it may be used again for future cultivation, and the cycle repeated as many times as feasible to minimize the amount of soil imported to the site. If soil cannot be reused, it will be disposed of at a permitted disposal facility. All compost and waste areas are located well outside of any riparian buffer zones. Applicant properly contains and manages this area with best management practices implemented to prevent undesirable constituents or nutrients from entering the environment and surface waters. See Appendix 10 – Soils Management Pile Containment.

Non-cannabis solid waste: Non-cannabis solid waste and recycling generated by the proposed project will be collected and disposed of at a self-haul center.

Refuse Disposal: Solid waste is stored in sealed bags inside a covered dump trailer and taken weekly to permitted transfer stations to prevent the potential of leeching and transport of materials to surface waters and disturbance by wildlife.

Human Waste: Applicant has installed portable toilets at the eastern portion of the parcel, by the processing facility, that are serviced by a licensed provider as required per usage. Portable toilets are placed outside of SMA's and in locations that do not pose a threat to water quality or wildlife habitat. There is an existing septic and leach field to the southern portion of the central office in the center of the parcel.

F. Detailed Measures Taken to Ensure Protection of Watershed and Nearby Habitat

All cultivation areas are approximately 400 feet from Redwood Creek and 600 feet from Somerville Creek. Buffers from these drainages are naturally sloped, undeveloped, and heavily vegetated with native trees and brush. Riparian buffers will be maintained, and

operations will be excluded from these areas and protected to maintain their essential functions. Applicant consults with Timberland Resource Consultants prior to any expansion to comply with required watercourse setbacks and maintenance of vegetative buffers.

As stated in the soils management section under on-site waste management, the applicant constantly monitors the used soils storage & reconditioning area as well as compost area by implementing a wood barrier staked in with t-posts around the soils reconditioning pile, and covered with a black tarp so no run off or erosion will potentially effect nearby watersheds and habitat, and stays maintained within the allocated space for a controlled environment.

To maximize protection to the watershed, cultivation operations are sited along a descending ridgetop, outside of any streamside management areas and generally in areas of mild slopes. There are no watercourse crossings on this parcel or on any private access road segment leading off property. The cultivation areas are approximately 400 feet from Redwood Creek and 600 feet from Somerville Creek, both Class I watercourses. The terraced cultivation areas on the property are maintained to promote drainage, infiltration, and dispersal of flows and prevent sediment transport to receiving waters. Ditch relief culverts have been implemented to drain an inside ditch along Old Briceland Road.

Applicant has implemented significant erosion control measures and is working with Timberland Resource Consultants to implement erosion control measures. Access roads to the property have been rocked and are free of ruts. Erosion along roads is controlled by drainage push outs located at favorable locations along the roads. Applicant has expanded flats and reconfigured drainage around unstable areas so that drainage no longer discharges into unstable features. Graded areas are proactively managed to mitigate runoff by routing stormwater to low gradient, well vegetated areas, allowing for dispersal and infiltration of flows thereby preventing runoff and erosion. Applicant has planted willow cuttings in these areas to further mitigate runoff.

Roads and terraced areas on the property are as hydrologically disconnected from watercourses as possible. All riparian setbacks and SMA buffers are observed, with cultivation areas far removed from streamside management areas. Cultivation areas have been covered with erosion control jute netting, straw wattles, and straw covered to prevent any sediment from being transported to surface waters.

G. Site Access, Vehicle Trips, and Parking

Site Access: The project site is located in Humboldt County, in the Briceland area, on the North and South sides of Old Briceland Road, at the intersection of Old Briceland Road and Greta Lane, on the property known as 7777 Old Briceland Road, Briceland.

Access within the project site is currently provided by an existing, rocked and graveled access road. The access road runs roughly north-south along the western boundary of the site.

Unauthorized access to the site is limited by an entrance gate with digital keypad entry that is located off of Greta Lane. A Knox Lock or other similar rapid entry system is installed on the gate to allow the Briceland Fire Department and other emergency responders to have access to the site in case of an emergency (e.g. fire, medical, emergency, etc.). See photographs # 23, 24, 25.

Vehicle Trips: The proposed project is estimated to generate an average of 8 daily trips during the peak season, with 4 trips during the morning peak hour and 4 trips during the evening peak hour. The project would have less than significant transportation impacts on vehicle miles traveled.

Parking: Parking within the project site is configured to accommodate 13 vehicles to provide sufficient parking for the proposed number of employees at full buildout of the project, with two of those parking spots ADA accessible, located directly outside the existing central building.

H. Inventory Control

- The facility is compliant with all Department of Cannabis Control (DCC) requirements and enrolled in the METRC system for seed to sale tracking.
- The operator only engages with licensed entities for business operations and has documentation, unique identifier numbers, and SKUs between every transfer of product on and offsite.
- Inventory is reconciled at the end of every week in manual logs and reported to the Compliance Director at the end of every month for monthly reconciliations in the METRC system and hard files.

I. Recordkeeping

a. All required records will be legibly prepared and stored in the administrative hold area required by DCC, which is a secured area where they are protected from debris, moisture, contamination, hazardous waste, fire, and theft. The administrative hold area is a limited access area, where only staff with the correct managerial credentials have access to these documents.
b. All records specifically required to be kept and maintained for state licensure will be kept for the period prescribed and, in a manner, allowing for their provision or delivery upon request. This includes all monthly inventory reporting, monthly METRC inventory reports of all items, and any other regulatory paperwork.

J. Employee Health and Safety

Employee Safety Protocols and Training: All employees will be provided with adequate safety training relevant to their specific job functions at the commencement of employment.

- Employee Handbook
- COVID 19 Prevention Program
- Workplace Injury & Illness Prevention Program
- Injury & Illness Prevention Program for Workplace Security

Depending on specific job functions, other training may include:

- Emergency action response planning
- Fire prevention planning
- Hazardous material handling procedures, including maintenance of Material Safety Data Sheet
- Job hazard analyses
- Personal protective equipment protocols
- Employee accident reporting and investigation policies

Facility Health and Sanitation Practices:

- Operations must be maintained in a clean and sanitary condition, including all work surfaces and equipment.
- Employees handling cannabis will have access to and use Personal Protective Equipment in good operable condition, as job circumstances require.
- Employees will implement protocols which prevent contamination or mold and mildew growth.
- Eyewash stations, emergency spill kits, and other emergency response tools are available to employees onsite in an emergency.
- Handwashing will be always available for employees, with clean running water, and proper sanitizing towels or drying devices.
- Clean drinking water will always be available for employee consumption.

K. Agency Personnel Access to the Facility

The owner and operator consent to all inspections of the property as needed, at any time during business hours from Monday to Friday, while this Agreement is in effect, by Code Enforcement Unit, Division of Environmental Health, Planning and Building, and any other agencies or departments that may need to inspect the property to determine that the terms of the Conditional Use Permit are being fulfilled.

L. Agricultural Employer Declaration

The permit applicant declares that it is an agricultural employer as defined in the California Labor Code, Division 2, Part 3.5 commencing with Section 1140, and agrees to comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employer.

SECTION V: References

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Redwood Coast Energy Authority (RCEA). 2021a. *PG&E – RCEA Comparison, Electric Power Generation Mix*. [Online]: https://www.pge.com/pge_global/common/pdfs/customer-service/other-services/alternative-energy-providers/community-choice-aggregation/RCEA_ElectricPowerGenerationMix.pdf.

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