

BARRETT FARMS, LLC
CULTIVATION, OPERATIONS, AND SECURITY PLAN

APN: 208-341-034

APPS# 11547

The following plan describes the general operations for managing a 14,650 square foot cultivation farm.

**1. Description of Water Source, Storage, Irrigation Plan, and
Projected Water Usage**

The project has been in the permitting process since 2016. This site has been developed and designed to optimize water retention through infrastructure capture, drainage and storage. Barrett Farms owns and operates these two adjoining properties. (APN:208-341-034 & 208-341-032) under one State License #CCL18-0002123. Operational procedures, facilities and resources are shared between the adjoining properties.

Currently this parcel cultivates 9,600 square feet of outdoor (light deprivation) cultivation and 2,000 sq ft of mixed-light cultivation. The primary water source is a rain catchment system. Rain catchment is sourced from (3) hoop houses with a collection area of 5,600 square feet, which amounts to approximately 240,000 gallons annually. The secondary water source is a permitted well on the adjoining parcel APN: 208-341-032. A voluntary forbearance period for well water irrigation will occur from May through October, during which time the site will rely on water already collected and stored in tanks. The applicant was awarded DCC water grant funds and (13) 5,000 gallon water tanks were added to the property in September of 2023. The site now has the capacity to store 105,750 gallons of water.

Estimated water usage is listed below in Phase 2 chart depicting 14,650 sf of cultivation area and water usage by month. The greenhouse rain catchment infrastructure together with additional tank storage located on adjoining property can support the increase of square footage estimated irrigation needs as shown in chart below.

Irrigation water is applied at agronomic rates to minimize over watering cannabis plants and reducing the risk of irrigation runoff. Irrigation is applied through a traditional drip irrigation system. Applicant uses sub-surface irrigation in short, frequent water cycles, which do not produce runoff. Applicant has safety and check valves on all tanks in case of leaks. Applicants will be watering every other day, and feeding plants every three to four days during the growing season. Applicant waters in the morning/early evening hours to reduce evaporative loss.

1.a. Actual 5-year Averaged Water Use:
 11,6000 square feet cultivation area

Phase 1

| Jan | Feb | Mar | Apr | May | June |
|-----|-----|-------|-------|--------|--------|
| 0 | 0 | 4,000 | 8,000 | 13,000 | 15,000 |

| July | Aug | Sept | Oct | Nov | Dec |
|--------|--------|--------|-------|-------|-------|
| 15,000 | 15,000 | 13,000 | 9,000 | 7,000 | 3,000 |

Total Water Use = 102,000 gallons

1.b. Estimated Water Use:
 14,650 square feet cultivation area

Phase 2

| Jan | Feb | Mar | Apr | May | June |
|-----|-----|-------|--------|--------|--------|
| 0 | 0 | 5,000 | 10,000 | 14,000 | 17,000 |

| July | Aug | Sept | Oct | Nov | Dec |
|--------|--------|--------|--------|--------|-------|
| 17,000 | 17,000 | 15,000 | 14,000 | 10,000 | 5,000 |

Total Water Use =124,000 gallons

2. Description of Site Drainage, including Runoff and Erosion Control Measures

SITE DRAINAGE: There is one watercourse located on the property; a Class II stream which runs along the property boundary in a gully. There are no fish bearing streams on the property. There are no stream crossings or culverts located on the property. As this property is a member of the Cobb Road Association, plans exist to install permanent road drainage structures which will shape the road surface (such as rolling dips) to minimize road maintenance, hydrologically disconnect road segments, and effectively disperse water flow. The Applicant has installed french drains in and around the green houses and graveled/rocked the area on the property to improve site drainage. Straw wattles are used near the soil pile to increase retention and reduce site drainage.

EROSION CONTROL MEASURES: There is no erosion on-site in stream channels or on the banks. The Road Association will install water features and ditch relief drains, rolling dip outlets, and road pads. The Application will terrace surfaces to promote infiltration/dispersal of outflows

and prevent erosion along developed areas. Any exposed soils will be seeded with native grasses to prevent bare soil erosion.

RUNOFF CONTROL MEASURES: None of the cultivation areas or associated facilities discharge to surface water. However, in the event of runoff, the riparian buffer is vegetated and is sufficient to filter waste. To further stabilize site runoff, Applicant has applied a thick layer of straw to the slope on the east side of the greenhouses to adequately maintain vegetation around cultivation areas. Applicants also seeds and mulches bare soil areas and has installed straw waddles around the downhill perimeter of the cultivation area, and along the streamside zone to capture any runoff and prevent delivery to surface waters. All greenhouses utilize live soil and have permeable floors. French water drains have been placed on the inside and outside of all greenhouses and driveways.

3. Details of Measures Taken to Ensure Protection of Watershed and Nearby Habitat

PROTECTION OF WATERSHED AND HABITAT: Cultivation areas are all setback at least 100-feet from the nearest watercourse. Buffers are maintained at natural slope with native vegetation to prevent sediment transport to receiving waters. These buffers are unaltered and appear to be of sufficient width to filter wastes from runoff and to maintain essential functions of riparian areas. Riparian areas are protected in a manner that maintains their essential functions. Spoils are not stored in a place where they can enter any surface water.

The grower, designated as the “Discharger”, is enrolled in the SWRCB Waiver of Waste Discharge as a Tier I Low Risk Discharger. The cultivation site includes a Site Management Plan (SMP) for the property. A copy of the SMP is kept onsite for ongoing site management and regulatory inspections.

CULTIVATION RELATED WASTE PROTOCOLS: Applicant is implementing measures to reduce and/or eliminate cultivation related waste. All soil and plant related material will be piled, covered, and composted to prevent nutrient transport and will be reused as part of the applicant’s soils management plan. Pots containing starts and clones will be washed, rinsed, and reused between seasons and recycled at the end of their useful life. Applicant will recycle pesticide and fertilizer containers per California pesticide regulations. All other associated waste will be placed in garbage cans with lids and placed within the shed, as seen on the site plan, to prevent nutrients from being leached to groundwater or transported to watercourses. Applicant will determine frequency of disposal to permitted disposal sites that prevents rodent infestation and other nuisances on the property. This will likely be done on a bi-weekly schedule during the growing season.

REFUSE DISPOSAL: The site generates little human refuse. All trash collection containers are located on the applicant’s adjoining property (APN: 208-341-032). There, Applicant is using an animal-proof dumpster to dispose of refuse to prevent leaching and transport of foreign

materials to receiving waters. The cans are housed in a fenced area on the property. Applicants will determine the frequency of pickup and delivery to disposal facilities that prevents rodent infestation and other nuisances on the property. This will likely be done on a bi-weekly schedule during the growing season.

HUMAN WASTE: There is a septic system on the applicant's adjoining property (APN: 208-341-032). Applicants will also be implementing an OWTS with a restroom and handwashing facilities.

4. Protocols for Proper Storage and Use of Fertilizers, Pesticides, and Other Regulated Products

Currently the amendments and pesticides utilized in the cultivation process and include:

- Zeroto- 2.5 gallons
- Sanidate- 2.5 gallons
- Nuke Em- 2.5 gallons
- Chester Boons- 1 gallon

A dedicated, secure, and fully contained shed will be used for the storage of all amendments located on the applicant's adjoining property (APN: 208-341-032). Materials are kept in their original containers with product labels in place and legible. Appropriate Safety Data Sheets (SDS) are kept onsite as a component of the cultivator's SMP.

Currently the site has (1) 300 gallon, (1) 50 gallon diesel tanks, (2) 20 gallon and (4) 10 gallon propane cylinders. All fuel will be stored within an onsite shed with secondary containment, along with a Spill Prevention, Countermeasures, and Cleanup (SPCC) kit. As a safety measure, kits provide a supply of clean-up materials in the event of accidents, and are kept within fuel storage areas.

**Products are stored in secondary totes in on-site shed non-permeable floor surface

5. Description of Cultivation Activities (Outdoor & Mixed Light)

CULTIVATION ACTIVITIES: Applicant is anticipating (2) planting cycles of cultivation per year. Applicant will be cultivating in raised beds to prevent excess irrigation runoff and promote soil moisture retention. Cover crops will be planted at the end of the year to promote soil regeneration.

The site currently uses solar and a EU 2000 gasoline generator for electricity. A 7.9kW array and battery bank system is in place with the plan to expand through the DCC renewable energy grant program. The generator will be used only as a backup source until the full solar system is installed and operational. The EU 2000 runs at or below 59dB and is housed in a generator shed to ensure meeting perimeter noise restrictions required by environmental regulations.

Any greenhouse or propagation area with supplemental lighting will be properly maintained to avoid being visible from any neighboring property between sunset and sunrise. The site will comply with International Dark Sky Association standards for Lighting Zone 0, and prevent light spillage which may impact local wildlife. Any and all complaints received in writing regarding light spillage will be corrected within 10 business days from the date of receipt.

Applicant anticipates hiring one (1) full-time employee for cultivation. Applicant does not anticipate increased road activity. Peak road usage will be between 8:00 AM to 9:00 AM and 5:00 PM to 6:00 PM. Parking will be provided near the entrance to the cultivation site and there will be no on-site housing. Applicant has a permanent flush facility on the adjoining property (APN: 208-341-032) that has two toilets on-site, is connected to a septic system and is at least 50-ft. away from where individuals may work.

Applicant will comply with all applicable federal, state, and local laws and regulations governing California agricultural employers. Applicant will execute a statement declaring it is an agricultural employer as defined in the California Labor Code.

Applicant will follow all performance standards outlined in Humboldt County's Commercial Medical Marijuana Land Use Ordinance ("CMMLUO") with respect to cultivation activities, including developing employee safety protocols which include: 1) an emergency action response plan and spill prevention protocols; 2) employee accident reporting and investigation policies; 3) fire prevention policies; 4) maintenance of Material Safety Data Sheets (MSDS); 5) materials handling policies; 6) job hazard analysis; and 7) personal protective equipment policies. Applicant will ensure that all safety equipment is in good and operable condition, and provide employees with training on the proper use of safety equipment.

Applicant will post and maintain an emergency contact list which includes: 1) operation manager contacts; 2) emergency responder contacts; and 3) poison control contacts. All cultivation activities will be charted and calendered and visibly posted in the cultivation facilities.

HEALTH AND SAFETY: When employees are hired this site will be operated as an "agricultural employer" as defined by the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code, and comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employers. At the first establishment of 20 or more employees, the firm will sign and enact a Labor Peace Agreement and allow upon written request, all bona fide labor organizations access at reasonable times to areas in which the farm's employees work, for the purpose of meeting with employees to discuss their right to representation, employment rights under state law, and terms and conditions of employment.

SCHEDULE OF ACTIVITIES DURING EACH MONTH OF THE GROWING AND HARVESTING SEASON:

January- March

- Purchase seeds and clones of desired strands
- Clean greenhouses and make any necessary repairs
- Amend soil using EWC, compost, co-co fiber, crab meal, and bone meal
- Pot clones and starts
- Approximate generator use: 4 hours/night
- Water usage reporting

April

- Begin watering
- 1st Light Dep Cycle: Planting at the beginning of the month
- Apply nutrient feed with every 3rd watering
- Attach greenhouse tarp covers
- Construct trellis system for plants
- Approximate generator use: 4 hours/night

May

- Water greenhouses every 3rd day
- Apply nutrient feed with every 3rd watering
- Approximate generator use: 4 hours/night

June

- Outdoor Cycle planted
- Water greenhouses every other day
- Apply nutrient feed with every 3rd watering
- Pull tarps for light deprivation
- Approximate generator use: 1 hr./day

July

- Apply nutrient feed with every 3rd watering
- Water greenhouses every other day
- Pull tarps for light deprivation
- Begin de-leafing plants
- 1st Cycle of Light Dep harvested

August

- 2nd Cycle of Light Dep planted
- Water greenhouses every other day
- Apply nutrient feed with every 3rd watering

- Pull tarps for light deprivation
- De-leaf plants
- Trim and manicure harvested plants
- Approximate generator use: 1 hr./day

September

- Water greenhouses every other day
- Apply nutrient feed with every 3rd watering
- Pull tarps for light deprivation
- De-leaf plants
- Continue harvesting
- Begin replanting
- Trim and manicure harvested plants
- Approximate generator use: 1 hr./day

October

- 2nd Cycle of Light Dep harvested
- Water greenhouses every 3rd day
- De-leaf plants
- Trim and manicure harvested plants

November

- Harvest Outdoor Cycle
- Trim and manicure harvested plants
- End of year reporting
- Clean and landscape cultivation areas

December

- End of year reporting
- Clean and landscape areas used in cultivation
- Plant cover crops

6. PROCESSING PLAN AND ACTIVITIES

Applicant will dry and store all products on the adjoining property (APN: 208-341-032) under the shared State License CCL18-0002123.

Applicant currently has a contract with their supply chain distributors for fresh frozen raw product, trimming services, testing, sales and transportation. Twice each year the distribution company sends a crew of 5-6 employees to work 5-6 days, each day they work a full day harvesting and transporting the fresh frozen product back to the local distribution company. Raw flower product will be machine trimmed onsite and/or taken offsite to hand trim.

During harvest months, the climate is warm and dry. Therefore, harvested plants can be air-dried. Humidity and temperature will be monitored to ensure proper conditions for curing. Cut flowers will be de-leafed and inspected for mold and then brought to the dry room. Flowers will remain on stalk and hung on screen racks for approximately 4-7 days.

The Applicant will use a moisture meter to determine dryness. If the moisture content is below 15%, mold development is prevented. Upon reaching sufficiently safe moisture content, flowers will be bucked, placed into sealed plastic bins, and moved into the curing room. Bins will be regularly opened and closed to enhance flavor and aroma and to ensure a fully dried product for packaging and storage in the cultivation facility.

Flowers will then be bagged, barreled, and moved to sealable totes inside the shipping container where they will remain until ready to be trimmed. Flowers will be either machine trimmed onsite or sent to a supply chain licensed partner for processing. The machine trimmed product will be separated and packaged in one-pound increments, bagged, sealed, and moved back into storage for distribution transport. Trim will be gathered for secondary manufacturing markets and picked up by a licensed manufacturing supply chain partner.

The facilities will be equipped with a toilet to support one part time seasonal worker as well as supplies for cleanliness and sanitation. Hand sanitizing liquid, gloves, potable water, and face masks shall be provided to Barrett Farms' employee and visiting distribution employees. Potable water will be supplied from groundwater sources located on the property and stored in tanks.

All rooms will be sanitized after every use using organic cleaning products to prevent mold growth and other contaminants. Emergency contact numbers will be posted in working areas, including the local poison control center.

Applicant will implement the following safety practices for alas a part of the processing plan: 1) functioning safety equipment, including masks, gloves, and respiratory equipment will be in good and operable condition; 2) poison control and emergency services contacts will be posted in cultivation areas; 3) safety signage will be posted and spillage prevention policies will be developed.

7. SECURITY FEATURES

Applicant has implemented security measures to safeguard the product and prevent nuisance from occurring on the property. Cobb Road Association maintained a locked security to restrict entry of any unknown vehicles. The application has installed an internet based security system including 12 actively recording cameras covering various points of entry. All doors and windows on all buildings are lockable. Applicant has "PRIVATE PROPERTY," and "NO TRESPASSING," signs posted on property gates. All finished marijuana products are stored away from processing activities in a locked facility. A terrier mix dog is used for additional property security.

