

**CALI'S FINEST GARDENS, LLC.  
CULTIVATION AND OPERATIONS MANUAL  
HUMBOLDT COUNTY, CA**

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**PROPOSED MEDICAL CANNABIS  
CULTIVATION FACILITIES**



PREPARED FOR:



September 2017

**Cultivation and Operations Manual  
For  
Cali's Finest Gardens, LLC.**

**Proposed Medical Cannabis Cultivation Facilities  
APN No. 210-072-009  
Application No. 12468**

Lead Agency:

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September 2017

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## 1. PROJECT SUMMARY

### 1.1. PROJECT OBJECTIVE

CALI'S FINEST GARDENS, LLC. is proposing to permit existing medical cannabis cultivation activities in accordance with the County of Humboldt's (County) *Commercial Medical Marijuana Land Use Ordinance* (CMMLUO). The project requires a Conditional Use Permit (CUP) for approximately 30,000 square feet (sf) of light-deprivation outdoor cannabis cultivation area. The project proposal includes the permitting of existing and proposed facilities appurtenant to the cultivation, including greenhouses, cultivation facilities for drying, curing, trimming and storing cannabis, and appropriate water storage. The applicant aims to become fully compliant with State and Local cultivation regulations.

### 1.2. SITE DESCRIPTION

The Project is located at China Mine Road, (APN 210-072-009) just east of the community of Bridgeville, California. The subject parcel is approximately 258 acres in size (per the County of Humboldt's WebGIS), having relatively flat topography and slopes of less than 15% gradient in cultivation areas, with steeper slopes of 30-45% gradient on other portions of the property. The northern half of the property is primarily forested, and the northern parcel boundary runs adjacent to Highway 36. The southern half of the property is a mix of grassland and woodlands. Mule Creek runs through the southern half of the parcel. The primary single-family residence is located near the centroid to the parcel (40°26'6.67"N, -123°40'51.47"W) and approximately 1,200 square feet in size. Two cabins not associated with the cannabis project are located on the southeastern edge of the parcel.

### 1.3. LAND USE

The subject property has a General Plan designation of Agriculture Grazing and Timber as identified by the Humboldt County General Plan and is zoned Agriculture Exclusive (AE) and Timber Production Zone (TPZ). Land uses surrounding the parcel are comprised of timber and agriculture. The surrounding parcels are zoned Agricultural Exclusive (AE), Timber Production Zone (TPZ) and Unclassified (U).

### 1.4. STATE AND LOCAL COMPLIANCE

#### 1.2.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

CALI'S FINEST GARDENS, LLC. holds (1) Medium Mixed Light Tier 1 License and (1) Small Mixed Light Tier 1 License for commercial cannabis cultivation.

#### 1.2.2. STATE WATER RESOURCES CONTROL BOARD

The applicant is enrolled as a Tier 1 Low Risk discharger (WDID 1\_12CC417947) under State Water Resources Control Board (SWRCB) Order WQ 2017-0023-DWQ. The SWRCB Order provides a framework for managing water quality, instream flow impacts, and wastewater discharge associated with commercial cannabis cultivation. Dischargers must implement Best Practicable Treatment or Control (BPTC) measures and submit technical and monitoring reports to ensure compliance with the order. The applicant has a Site Management Plan (SMP) summarizing existing and proposed BPTC measures for compliance with the SWRCB's General Order.

### **1.2.3. HUMBOLDT COUNTY BUILDING DEPARTMENT**

All necessary building permits will be obtained from the Humboldt County Building Department for all existing and proposed structures and supporting infrastructure upon approval of the Conditional Use Permit (CUP).

### **1.2.4. CAL FIRE**

The subject property is located within a State Responsibility Area (SRA) for fire protection. Several improvements are proposed in order to meet SRA requirements, including designating a fire turn-around and pull-out area for emergency vehicles, and management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines.

A 2,5000 gallon tank designated for fire suppression is located above the cultivation flat.

### **1.2.5. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

A Lake and Streambed Alteration Agreement (LSAA No. 1600-2019-0662-R1) from the Department of Fish and Wildlife (DFW) was obtained for culvert replacement, and restoration of drainages. No diversionary sources were permitted. Water for domestic and irrigation use are sourced exclusively from the permitted groundwater well and rainwater catchment pond.

### **1.2.6. CULTURAL RESOURCES**

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

## **2. CULTIVATION AND PROCESSING**

### **2.1. LEGACY CULTIVATION AND RELOCATION**

Five scattered cultivation areas existing pre-2016 will be relocated and consolidated on the property due to their potential environmental impacts. The cultivation area located at the western edge of the property (approximately 3,000 sf) will be relocated due to slopes exceeding 15% gradient. Two cultivation areas located in the southern portion of the property on either side of Mule Creek (approx.. 7,000 sf and 3,000 sf, respectively) will be relocated due to their proximity to riparian habitat and Mule Creek. Two cultivation areas upslope from Mule Creek (approx. 1,500 sf and 2,000 sf, respectively) will be relocated due to steep slopes and lack of road access. Consolidation of these scattered cultivation areas into one central cultivation areas with flat topography and significant distances from streams will be environmentally superior to existing conditions.

### **2.2. PROPAGATION AND INITIAL TRANSPLANT**

Juvenile plants are propagated on site and from an offsite nursery. 'Mother plants' that demonstrate the desired genetics for the specific cannabis strain are used for 'cloning' of new juvenile plants. Juvenile plants are also grown from new seed stock. Mother plants remain in the vegetative stage solely for propagation. Cuttings are sampled from the mother plants and are rooted into a growing

medium, typically oasis cubes, to produce 'clones.' After 2 weeks, the clones are placed into the greenhouse nursery, and once fully rooted they are transplanted directly into one (1) gallon plastic containers (see Appendix A for nursery location). The juvenile plants are irrigated using hand watering methods. After 2 weeks, the clones are then transplanted into 20-gallon smart pots with a soil and perlite medium, and moved into a vineyard style outdoor cultivation area or greenhouse where they continue their 'vegetative' cycle.

### **2.3. CULTIVATION PLAN AND SCHEDULE**

The outdoor cultivation will occur in ten (10) total greenhouses for a combined cultivation area of approximately 30,000 square feet. The greenhouse construction consists of 4"x4" (wood), 2"x4" (wood) and 2" PVC tubing. The greenhouses are then covered with translucent sheeting and the floors are covered with weed mats. Each greenhouse is ventilated by intake and exhaust fans powered by solar arrays and back up generators. The monthly Cultivation Schedule in Appendix C details the cultivation activities.

### **2.4. IRRIGATION PLAN AND SCHEDULE**

Irrigation and fertigation of plants occurs using top-feed hand watering methods for all juvenile plants and drip emitters for all adult plants. CALI'S FINEST GARDENS, LLC. maintains that irrigation and fertigation is more efficiently managed via hand watering for juvenile plants, allowing for daily inspection of each plant by the cultivator and tailored irrigation and nutrient application depending on the needs of each individual plant. Nutrient application for adult plants is done by hand to efficiently manage nutrient inputs. The monthly Cultivation Schedule in Appendix C details the irrigation activities associated with all cultivation.

### **2.5. HARVESTING, DRYING, AND TRIMMING**

Plants that are ready for harvest have their flowering branches removed and suspended in a 12'x24' conex box designated for drying and harvest storage. The applicant proposes to construct a 50'x100' drying and harvest storage building by the existing rainwater catchment pond.

The dried flowers are then transported offsite to a licensed processing facility.

### **2.6. PROCESSING FACILITY**

All cannabis processing is currently conducted offsite. Cali's Finest is proposing to build a two-story 40'x80' ADA-compliant commercial building that will allow for processing to occur onsite. The ADA-compliant restroom will include a working flush toilet as well as a sink with cold and hot running water provided by an on demand electric water heater. The proposed metal building will have an engineered concrete slab and will conform to commercial building standards per the 2016 California Building Code.

### **2.7. EMPLOYEE PLAN**

CALI'S FINEST GARDENS, LLC. is an "agricultural employer" as defined in 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 complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

#### **2.7.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY**

- *Agent in Charge:* Responsible for business oversight and management of the CALI'S FINEST GARDENS, LLC. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.

- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical cannabis. Responsibilities include, but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- *Assistant Cultivator / Processing Manager*: Provides support to the *Lead Cultivator* in their day to day duties and takes the lead role during times when the *Lead Cultivator* may be off site. Once processing activities commence, the *Assistant Cultivator* duties switch to oversight and management of processing the dried medical cannabis. This is a full-time, seasonal position.
- *Seasonal Laborer*: Provides cultivation, harvesting, and processing support including trim machine operation and hand-finish trimming. This is a part-time to full-time, seasonal position.

#### **2.7.2. STAFFING REQUIREMENTS**

In addition to the *Agent, Lead Cultivator, and Assistant Cultivator positions*, up to three (3) full-time seasonal labor positions are employed. During the peak growing and harvest season, there are an estimated total of five (5) employees on site.

#### **2.7.3. EMPLOYEE TRAINING AND SAFETY**

Onsite cultivation, harvesting, and drying are performed by employees trained on each aspect of the procedure including: cultivation and harvesting techniques and use of pruning tools; proper application and storage of pesticides and fertilizers; trim machine use and cleaning; and correct hand trimming methods. All staff members will be provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying and processing facilities are limited to authorized and trained staff.

All employees are trained on proper safety procedure including fire safety; use of rubber gloves and respirators; proper hand washing guidelines; and protocol in the event of an emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets (MSDS) are kept on site and accessible to employees.

#### **2.7.4. TOILET AND HANDWASHING FACILITIES**

The proposed processing facility will include one (1) ADA-compliant restroom, including a working flush toilet as well as a sink with hot and cold running water. Anti-bacterial Liquid Soap and paper hand towels will be made available. Employees will work at a distance typically no greater than 1,000 feet from the restroom facility.

#### **2.7.5. DRINKING WATER SOURCE**

The existing residence will have domestic water provided by the well on site. CALI'S FINEST GARDENS, LLC. will also provide safe, clean, purified drinking water via store bought individual sealed bottled water bottles as well as an upright office style water cooler. Clean disposable paper cups will be made available to all employees.

#### **2.7.6. ON SITE HOUSING**

The primary 30'x40' single-family residence located near the cultivation site is occupied by the owner and employees on a seasonal basis. No additional residences are proposed at this time. Cabins on the southern edge of the parcel are not associated with the project.

## 2.8. SECURITY PLAN AND HOURS OF OPERATION

### 2.8.1. FACILITY SECURITY

An entry gate is located off China Mine Road at the east perimeter of the parcel. The entry gates remain locked at all times and access to the cultivation area is limited exclusively to employees. Restricted access signs are posted conspicuously at the entry gates. The cultivation and processing facility area will have low intensity exterior lighting to illuminate the entrances, if needed. All lighting will be designed and located so that direct rays are confined to the property and conform to Dark Sky Standards. Security cameras have been installed at the main access gates and at entrances to the facilities, and the proposed processing facility will include an alarm system.

### 2.8.2. HOURS OF OPERATION

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as processing typically occur no earlier than 8 AM and extend no later than 8 PM.

## 3. ENVIRONMENT

### 3.1. WATER SOURCE AND PROJECTED WATER USE

Water for domestic use is provided by a domestic groundwater well. Water for cannabis cultivation uses is provided by the groundwater well and a 345,000 gallon offshore rainwater catchment pond. An additional 70,000 gal rainwater catchment pond is proposed for irrigation and fire suppression. CALI'S FINEST GARDENS, LLC. utilizes water management strategies such as hand watering and drip emitters to conserve water use.

The table below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use. The total annual water usage for cannabis cultivation is projected to be approximately 535,000 gallons.

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0	60,880	68,490	76,100	91,320	91,320	76,100	68,190	0	0

### 3.2. WATER STORAGE

Water storage for irrigation use is provided in the form of offshore ponds and water storage tanks. The property has an existing pond with an estimated capacity of 345,000 gallons and the project proposes the construction of an additional pond with a capacity of approximately 70,000 gallons. There are 27,500 gallons of HDPE hard storage tanks dedicated to cannabis irrigation: three (3) 5,000-gallon, (3) 3,000-gallon, (2) 2,500-gallon storage tanks, and two (2) 500-gallon storage tank. Total existing water storage is 372,500 gallons and proposed is 70,000 gallons for a total of 442,500 gallons.

### 3.3. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

Cali's Finest Gardens, LLC is enrolled with the State Water Resources Control Board (SWRCB) for Tier 2 coverage, and a Site Management Plan (SMP) has been developed utilizing best management practices (BMP's) in accordance with the SWRCB's recommendations.



### **3.3.1. SITE DRAINAGE AND RUNOFF**

The site is mostly flat with slopes generally under 15% in cultivation areas. Surface flow in the wet season generally draining from the north to the south. Drainage in the north is directed by road ditches to the wooded area above the residence where the water is dispersed by forest litter. Water in the center of the lot is directed east or south to wooded areas and dispersed into forest litter. To the south, water drains southward into Mule Creek. There is approximately 2,800 feet of road connection from the west parcel line to the east parcel line in the southern portion of the parcel. The driveway to the main residence has been rocked and drainage from the access road and has been disconnected from the stream system. There are multiple stream crossings on the southern portion of the site. The existing greenhouses are located away from riparian zones. Fertilizers are currently stored in a storage shed with secondary containment to prevent contamination with runoff. Sites have been identified for storage/disposal of spoils and cultivation waste.

Cultivation facilities will meet all required setbacks from the nearest water course, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented including the use of hand irrigation and drip emitters to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone.

### **3.3.2. EROSION CONTROL**

CALI'S FINEST GARDENS, LLC. will utilize best management practices including but not limited to:

1. Maintenance of roads, including rocking and armoring.
2. Proper management of solid, liquid and cultivation waste (see section 3.8)
3. CALI'S FINEST GARDENS, LLC. has a DFW LSAA for its culverts and stream crossings.
4. Cultivation facilities and spoil stockpiles will meet all required setbacks from riparian and wetland areas.
5. Irrigation and application of fertilizers will be applied at agronomic rates.
6. Regulated products will be safely stored with secondary containment (see section 3.7)

### **3.4. WATERSHED AND HABITAT PROTECTION**

Adherence to the proposed best management practices ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures meet all required setbacks from the nearest watercourse, providing a suitable buffer between the cultivation operation and habitat. Additionally, site development and maintenance activities utilize BMP's in accordance with the SWRCB's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits.

### **3.5. MONITORING AND REPORTING**

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the Site Management Plan (SMP) and determine if the site meets all Standard Conditions. Inspections will include photographic documentation of any controllable sediment discharge sites as identified on the site map. Visual inspection will occur at those locations on the site where pollutants or wastes, if uncontained, could be transported into receiving waters, and those locations where runoff from roads or developed areas drains into or towards surface water. The inspection will also document the progress of any plan element subject to a time schedule, or in the process of being implemented. A monitoring plan is included in the SMP with photo points identified on SMP map.

Onsite monitoring shall occur:

- Before and after any significant alteration or upgrade to a given stream crossing, road segment, or other controllable sediment discharge site. Inspection should include photographic documentation, with photo records to be kept on site.
- Prior to October 15 and December 15 to evaluate site preparedness for storm events and stormwater runoff.
- Following any rainfall event with an intensity of 3 inches precipitation in 24 hours. Precipitation data can be obtained from the National Weather Service by entering the site zip code at <http://www.srh.noaa.gov/forecast>.

A Monitoring and Reporting Form will be submitted upon initial enrollment in the Order (NOI) and then annually by March 31 to the Regional Water Board. The annual report will include data from the monitoring reports.

### **3.6. ENERGY AND GENERATOR USE**

Exhaust fans, water pumps, and nursery lighting is powered by solar arrays and three emergency back up generators (Honda 7000). The generators are located in containment sheds away from the property line to ensure the noise level does not exceed 60 decibels. The generator and fuel need to be located within secondary containment to prevent discharge into Waters of the State.

The applicant is applying for an electrical power drop from Pacific Gas and Electric Company (PG&E) and, regardless, will develop an alternative renewable (solar, wind, micro-hydro) energy plan within 3 years of project approval and to fully implement the plan within 5 years from project approval so that generator use may be retired.

### **3.7. USE AND STORAGE OF REGULATED PRODUCTS**

#### **3.7.1. BEST MANAGEMENT PRACTICES**

Best Management Practices (BMP's) are employed when storing, handling, mixing, application and disposal of all fertilizers, pesticides and fungicides. All nutrients, pesticides and fungicides are located in a locked storage room, and contained within water tight, locked and labeled containers in accordance with manufactures instruction. Application rates will be tracked and reported with the end of the year monitoring report required in the Site Management Plan (SMP). Employees responsible for application are trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with the manufacturer's recommendations. See the WRPP for complete BMP specifications for the use and storage of regulated products.

#### **3.7.2. FERTILIZERS**

Nutrients and biological inoculants used for cultivation include:

- Maxsen (50 lbs. Bags)- 5 onsite at all times

See Appendix B - *Regulated Products Resource List* for product details.

#### **3.7.3. FUELS AND OILS**

Fuels and oils stored on site include:

- Diesel – 10 Gallons

### **3.8. WASTE MANAGEMENT**

#### **3.8.1. SOLID WASTE MANAGEMENT**

Trash and recycling containers will be located on a 12'x7' trailer parked near the residence. The trash containers are enclosed to prevent animal intrusion. Solid waste and recycling are hauled off-site to Eel River Disposal & Recovery transfer station at least once per week.

#### **3.8.2. CULTIVATION WASTE AND SOIL MANAGEMENT**

Cultivation vegetative matter such as root balls, branches, and leaves are hauled offsite to Eel River Disposal & Recovery transfer station. Spent potting soil is stored in the greenhouses the first year and then in a designated contained covered area in subsequent years. The soil containment area is lined to prevent any soil erosion or nutrient seepage. The soils are analyzed by a local consulting firm providing soil testing, analysis, and management services. After consultation, the soils are amended and reused. Used pots will be collected and stored in the barn for the winter. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate facility.

#### **3.8.3. WASTEWATER MANAGEMENT**

Dripline/Hand watering methods minimize the over-irrigation of plants and subsequent runoff. Moreover, the greenhouse floors are weed mats and will absorb any excess runoff.

A septic system is in place to service the residence.

## **4. PRODUCT MANAGEMENT**

### **4.1. PRODUCT TESTING AND LABELING**

Samples are selected from individual harvested cannabis strains and are tested by a licensed third-party lab in accordance with State and local standards.

### **4.2. PRODUCT INVENTORY AND TRACKING**

Cali's Finest Gardens maintains compliance with METRC and State tracking requirements.

### **4.3. TRANSPORTATION AND DISTRIBUTION**

Transportation will be handled by a third-party, contracted, licensed transporter/distributor in accordance with State and Local regulations. All merchantable product will be distributed through licensed medical cannabis dispensaries. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributor/transporter and will include:

- Product ID numbers and product weight
- Route to be travelled
- Origin and destination addresses
- Time of departure
- Time of arrival

The *Agent in Charge* and the *Processing Manager* are responsible for performing a physical inventory of all packages being transported, and ensuring that the physical inventory coincides with the transport manifest.

## 5. APPENDIX A: SITE PLAN

## 6. APPENDIX B: CULTIVATION ACTIVITIES SCHEDULE

# PR Professional Services

Project Management Consulting

**Schedule of Activities – Hours of Operation  
Cali's Finest Gardens  
County App # 12468  
File No (APN): 210-072-009**

**Schedule of Activities**

**May:** Site prep includes roto-tilling soil, amending beds, and erecting hoops.

**June:** Beds planted early May; then plants are regularly checked, watered, and fed.

**July:** Plants are regularly checked, watered, cages and trellis are placed around plants for support.

**July:** Harvest toward end of July; replant end of July.

**August:** Plants are regularly checked, watered, and fed. Cages and trellis are placed around plants for support.

**September:** Harvest toward the beginning or middle of October.

**October:** Break down site in preparation for winter. Sew cover crops.

**Hours of Operation – 8am to 8pm**

**Weekly Schedule**

MON	TUE	WED	THU	FRI	SAT	SUN
8am - 8pm	8am - 8pm	8am - 8pm	8am - 8pm	8am - 8pm	10am-6pm	10am-6pm

**Staffing Table - Person Hours by Month**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
<b>Total Person Hours per month (@1.5 persons)</b>	0	0	44	84	178	192	192	284	224	192	68	0

<b>TOTAL Person Hours Per Year:</b>	<b>1458</b>
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NOTE: Person Hours may vary based on weather and/or unforeseen issues that may arise. Hours are based on median estimates.  
Staffing Table - Person Hours by Month

Thank you,

Paula Pavlich, Agent  
PR Professional Services  
(707) 496-1455

## 7. APPENDIX C: REGULATED PRODUCTS RESOURCE LIST

## 8. APPENDIX D: REFERENCES

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## 9. APPENDIX H:

- Affidavit
  - Activity Registration Form
  - Pre-2016 Cultivation-  
Documentation
  - Evidence of Ownership
  - Legal Documentation
  - Indemnification Agreement
  - CMMLUO  
Acknowledgement
  - Notarized Written Consent
  - Department of Health and  
Human Services  
Questionnaire
  - Well log and permit
-