

Cultivation & Operations Plan



Prepared For:
BIG RIVER FARM, LLC
APN#108-023-008
County Application # 11892
WDID #: 1B16656CHUM, 1_12CC408939
CDFA Provisional License #: CCL18-0003029

Lead Agency:
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APPENDICES

Appendix A: Plot Plan

Appendix B: Cultivation Schedule

1. PROJECT SUMMARY

PROJECT OBJECTIVE

Big River Farm, LLC is proposing to permit existing Cannabis Cultivations activities in accordance with the County of Humboldt Commercial Marijuana Land Use Ordinance (CMMLUO). The applicant proposes a Conditional Use Permit (CUP) for a total of 21,910 SF based a pre-existing footprint of 21,998 SF prior to December 31, 2015. The project consists of SIX (6) light deprivation greenhouses, a Structure for Drying and Curing, and a proposed 34'x64' ancillary nursery structure. The greenhouse structures are as follows: GH #1: 34'x127', GH #2: 34'x160', GH #3: 34'x96' and GH #4: 34'x92', GH#5: 30'x90', GH#6: 34'x90' totaling 21,910 SF. All greenhouses are outdoor and utilize light deprivation techniques. There will be no use of artificial lighting used in these structures. The proposed ancillary nursery or immature plant area is 30'x73' for a total of 2,190 SF. The ancillary nursery will allow the applicant to propagate and grow plants in a vegetated state before being moved into the flowering greenhouses.

Current irrigation water storage is 88,700 Gallons which includes a 40,000-gallon rain catchment tank fed from the roof of the 2,400 SF residence. Up to 50,000 gallons of additional water storage is proposed to be installed via an awarded grant (2023) for a total of 138,700 gallons against the estimated 219,000 gallons of annual water use. Rain catchment will further off-set this water use. The current water supply for domestic and irrigation is provided from a permitted 310' depth groundwater well. The well is not Hydrologically connected and the water storage provided will provide water

Drying and Curing occurs onsite in an oversized garage (30'x40') attached to a 1,200 SF residence. Processing will occur off-site at a licensed processing facility. Harvest Storage is located in a secured conex box located next to the upper residence. There is a 30'x40' storage shed located that is used to store all cultivation supplies. Nutrients and pesticides are stored in this structure with secondary containment. All safety data sheets for agricultural materials are stored in this location with proper spill cleanup materials. Eye wash stations are located in all areas where nutrients and pesticides are stored or applied. Big River Farm, LLC is on-grid and service is provided by PG&E. There is a 25k Whisper-Watt Generator located near the residence. The use of this generator is limited to power outage events to power the drying facility and residences. A land survey has been completed by Kolstad Land Surveyors and the property line between the Parcel and BLM has been clearly marked to avoid any trespassing on public lands.

SITE DESCRIPTION

The project site is located approximately 23 miles north west of Garberville, CA. To reach the site from eureka take us-101 south for 63 miles to exit 642 to Redwood Drive. Continue onto Redwood Drive for 1.8 miles. Turn right onto Briceland thorn road for 10.0 miles. Continue straight onto Ettersburg road/honeydew road for 2.4 miles. Turn left to stay on Ettersburg honeydew road. Turn right to stay on Ettersburg honeydew road for 0.1 miles. Turn left to stay on Ettersburg honeydew road for 0.4 miles. Continue onto wilder ridge road for 3.9 miles. The destination will be on left. Approximate drive time from Eureka, CA 1 hour and 55 minutes with a distance of 85 miles. The site is located in section 34, township 3 south, range 1 east, h.b. & m. And can be seen on the Honeydew 7.5' quadrangle map. Furthermore, the site is located at latitude 40.1519 and longitude, -124.0524. The subject parcel is approximately 83.86 acres in size (per Humboldt county WEBGIS).

LAND USE

The subject property has a General Plan designation of Dispersed Housing as identified by the Northern Humboldt General Plan (NHGP) and is zoned AG (FRWK) Agriculture Exclusive; TPZ. The proposed cultivation area occupies less than two percent (2%) of the total prime soil area.

Land uses surrounding the parcel are comprised of residential, timber and agriculture. The surrounding parcels are zoned Agricultural Exclusive (AE), Timber Production Zone (TPZ), and Forest Recreation (FR).

2. STATE AND LOCAL COMPLIANCE CALIFORNIA

CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE (CDFA) – CAL CANNABIS

Big River Farms, LLC has obtained a Provisional Commercial Cannabis Cultivation License issued by California Department of Food & Agriculture – Cal Cannabis. Provisional License #: CCL18-0003029.

NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

Big River Farms, LLC has enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region (WDID Number 1B6656CHUM). A Water Resources Protection Plan was developed for the project by Six Rivers Construction & Consulting and has been implemented for activities associated with onsite cultivation since August 2017. A transition into the State Water Control Board order was completed in 2019. This transition included the development of the Site Management Plan (SMP).

STATE WATER RESOURCE CONTROL BOARD

Big River Farm, LLC has transitioned into the State's Water Resource Control Board General Order (WDID 1_12CC408939). A Site Management Plan (SMP) has been developed and implemented. Water Use Monitoring Reports are submitted on an annual basis. A total of 6 watercourse crossings exist on this property. The crossings are located on the lower road which has no cannabis related activities.

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.

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.

CALIFORNIA DEPARTMENT OF FISH & WILDLIFE

A 1600 notification was completed by Chris Carrol of Timberland Resource Consultants. An LSAA was issued by CDFW. There are a total of 6 crossings that will be upgraded on a lower road of the property not associated with the cultivation site. A copy of the LSAA has been filed with the Humboldt County Planning Department C-Pod division.

3. CULTIVATION AND PROCESSING

PROPAGATION AND INITIAL TRANSPLANT

Juvenile plants are propagated on site from 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. 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.' The clones are placed into the Ancillary Nursery, and once fully rooted they are transplanted directly into one (1) gallon plastic containers. The juvenile plants are irrigated using hand watering methods. After 2-3 weeks, the clones are then transplanted into 25-gallon plastic pots with a soil and perlite medium and moved into outdoor greenhouse where they continue their 'vegetative' cycle. The applicant has proposed a **30'x73' 2,190 SF Ancillary** Nursery to supply the project with an area to hold immature plants awaiting transplant into flowering Greenhouses. The Nursery will allow the applicant to grow mother plants to use for cloning proposes and a place to propagate clones.

CULTIVATION PLAN AND SCHEDULE

The outdoor cultivation will occur in the following greenhouses **GH #1: 34'x127', GH #2: 34'x160', GH #3: 34'x96' and GH #4: 34'x92', GH#5: 34'x90', GH#6: 34'x90'** totaling **21,910 SF** (light deprivation with no artificial lighting used). The greenhouses consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each greenhouse is ventilated by intake and exhaust fans. The greenhouses utilize light deprivation to produce up to two (2) flowering cycles per year. The monthly Cultivation Schedule in Appendix C details the cultivation activities associated with the outdoor, light deprivation operation for a typical two cycle year.

IRRIGATION PLAN AND SCHEDULE

Irrigation and fertigation of plants occurs using top-feed hand watering methods. **Big River Farms, LLC will be upgrading to an efficient drip irrigation to reduce water use and labor needs as soon as financially possible.**

HARVESTING, DRYING, & TRIMMING

Plants that are ready for harvest have their flowering branches removed and suspended in the drying room which is equipped with ventilation fans and climate control measures. The drying process takes approximately two weeks. The dried flowers are then bucked into manageable buds and storage in plastic storage containers and labeled with Packing Tags. **Drying currently occurs within a 30'x40' garage attached to a 1,200 SF residence constructed in 1990. The existing 30'x40' storage shed may be converted into an ag-exempt drying and harvest storage depending on market conditions.**

PROCESSING

All cannabis processing will occur off-site at a licensed processing facility.

EMPLOYEE PLAN

Big River Farms, 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.

JOB DESCRIPTIONS & EMPLOYEE SUMMARY

- *Site Manager:* Responsible for business oversight and management of the Big River, LLC. Responsibilities include, but are not limited to personnel management, record keeping, Metrc oversight, and liaison with State and County agencies as needed. This is a full-time position.
- *Cultivator:* Oversight and management of the day to day cultivation of 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, seasonal position.

- *Assistant Cultivator:* 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. This is a full-time, seasonal position.
- *Seasonal Laborer:* Provides cultivation, harvesting, and processing support on an as need basis.

STAFFING REQUIREMENTS:

In addition to the Site Manager, Lead Cultivator, and Assistant Cultivator positions, up to (2) part-time seasonal labor positions are employed. The number of seasonal laborers varies based on the needs of the farm during the cultivation, harvest and processing seasons. During the peak harvest and processing season, there are an estimated total of (4) seasonal employees that may be on-site.

EMPLOYEE TRAINING & SAFETY

On site cultivation, harvesting, and drying is 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. Access to the onsite cultivation, drying and processing facilities is 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 cultivation site. 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.

TOILET AND HAND & WASHING FACILITIES

Portable toilets are provided on-site near the cultivation area and by the drying and curing structure. A service contract has been established with Six Rivers Portable Toilets.

ON SITE HOUSING

There are (2) existing residences located on the subject parcel. One residence are non-cannabis related.

4. SECURITY PLAN & HOURS OF OPERATION

FACILITY SECURITY

Entry to the parcel is located behind a locked entry gate. 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 facility area will have low intensity downward facing exterior lighting to illuminate the entrances and will include a small number of motion activated security lights. All lighting will be designed and located so that direct rays are confined to the property. Security cameras will be installed at the main access gates and at entrances to the facilities. Facility will include an alarm system.

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 7AM and extend no later than 7PM.

5. ENVIRONMENT

WATER SOURCE AND PROJECTED WATER USE

Water for domestic use is provided by a 310' deep groundwater well. The location of the well is located over 600' away from an unnamed class III stream. Water is then pumped and stored in hard storage tanks during the winter months to ensure water levels throughout the year. There is a 40,000-gallon rain catchment tank that receives water from the 1,200 residence roof and 1,200 SF drying garage gutters. Big River Farm, LLC utilizes water management strategies to conserve and reuse onsite water and fertilizers to achieve net zero discharge.

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. **Water use is projected at 10 gallons per square foot canopy. However the applicant proposes to implement raised beds to eliminate the need to stockpile soil and enable the use of high-efficiency drip irrigation systems which will further reduce water use by reducing evaporative losses.**

Table 3.1: Estimated Annual Irrigation Water Usage (Gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0	20,000	25,000	33,000	36,000	41,000	36,000	20,000	8,000	0

WATER STORAGE

Water storage for irrigation use is provided in the form of water storage tanks. The property has (1) 40,000-gallon Rain Catchment Tank, (5) 5,000 gallon, (4) 3,000 gallon, (2) 2,500 gallon (2) 1,500 gallon, (1) 1,100 gallon, (1) 1,000 gallon, (2) 550 gallon and (1) 500 gallon. **Big River Farms, LLC has a total of 87,800 gallons of hard water storage.**

Big River Farms, LLC has secured a grant and expects to install up to ten more 5,000 gallon tanks (depending on procurement and delivery costs) for a total of 137,800 gallons of storage.

There is also 3,000 gallons of dedicated for storage for domestic use and 3,000 gallons for fire suppression use.

SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

Big River Farms, LLC is enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) for Tier 2 coverage and transitioned into the State Water Control Board as a tier 2 low risk. A Water Resources Protection Plan (WRPP) has been developed utilizing best management practices (BMP's) in accordance with the NCRWQCB's recommendations. The drainage and erosion control measures described below are referenced from the WRPP. A Site Management Plan (SMP) was developed in 2019.

SITE DRAINAGE & RUN OFF

Site investigation for the development of the WRPP And SMP showed no evidence of surface runoff associated with the cultivation, nor was there evidence that it had occurred in the past. This area has good vegetation ground cover consisting of native grasses with no evidence of leaching from cultivation related activities. Big River Farm has transitioned into the State Waterboard Cannabis Water Quality Monitoring & Reporting Program. Fertilizers and pesticides are currently stored in an agricultural storage structure that meets all requirements for secondary containment. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented including the use of hand irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone.

EROSION CONTROL

The SMP includes erosion and sediment control BMP's designed to prevent, contain, and reduce sources of sediment. The SMP also includes corrective actions to reduce sediment delivery, including stream crossing culvert maintenance and replacement and access road maintenance. Additionally, the SMP requires mulch piles and spoils from any grading to be stored in a designated location away from watercourse.

WATERSHED & HABITAT PROTECTION

Adherence to the SMP ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures are >150' from the nearest watercourse, providing a suitable buffer between the cultivation activity and habitat. Additionally, site development and maintenance activities utilize BMP's in accordance with the NCRWQCB's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits. Refer to the SMP for detailed descriptions of watershed and habitat protection measures.

MONITORING & REPORTING

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the Site Management Plane (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 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 storm water runoff.
- Following any rainfall event with an intensity of 3" 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 (Order No. 2015-0023 Appendix C) will be submitted upon initial enrollment in the Order (NOI) and then annually by March 31st to the Regional Water Board. The annual report will include data from the monitoring reports.

ENERGY AND GENERATOR USE

On-grid electricity is provided by PG&E for domestic and agricultural uses. Use of the on-site 25k Whisper-Watt Generator located near the processing facility is limited to power outage events, and follows all guidelines set forth by Humboldt County and the State of California. The generator noise level does not exceed 50 decibels within 100 feet from the generator storage area.

BEST MANAGEMENT PLAN

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 watertight, 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 SMP for complete BMP specifications for the use and storage of regulated products.

FERTILIZERS

Nutrients and biological inoculants used for cultivation include:

- Baicor Nutragreen 5-10-5
- Baicor PK
- MaxSea All Purpose (16-16-16)

PESTICIDES AND FUNGICIDES

- Diatomaceous Earth
- Organic Neem Oil
- Nuke 'Em
- Plant Therapy

FUEL AND OIL

Big River Farm, LLC has a 500-gallon fuel storage tank located near the backup generator on the parcel. This fuel tank is covered and stored in secondary containment. There is a spill kit, eye wash station and first aid kit located at the fuel storage area.

SOLID WASTE MANAGEMENT

Trash and recycling containers are located near the processing building in safe enclosed location to prevent animal intrusion. Solid waste and recycling are hauled off-site to Redway Transfer Station located in Redway, California.

CULTIVATION WASTE MANAGEMENT

Cannabis waste is composted on-site in the secured compost area or self-hauled to Eel River Transportation & Salvage. Spent potting soil is stored in a contained area with environmental measures in place. Spent soil is covered during winter months and then amended in pots before the further use. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate facility.

WASTEWATER MANAGEMENT

There is a permitted septic on-site. A copy of the permit has been provided to the Planning Department from DEH. The septic is serviced as recommended. The last service was done in 2020 by Steve's septic Service. Portable toilets and Handwashing stations are provided for employees and serviced by Six Rivers Portable Toilets.

6. CULTIVATION AND PROCESSING

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. The finished product is labeled with Unique Identifier Tags provided by METRC, the Statewide tracking system. Test results are uploaded into Metrc.

PRODUCT INVENTORY AND TRACKING

Big River Farm LLC is enrolled in and utilizes the METRC tracking system. The Site Manager ensure all cannabis from clone to packaged product is tracked, accounted for and inventoried. Records are kept at each phase of the harvest and processing operation for reporting and

compliance with State and Local regulations. The information recorded for each harvest includes:

- Cultivation canopy area
- Wet, Dry and Waste weights are documented and input into Metrc
- Once dry plants are bucked down and put into storage containers. Each container is labeled with a packaging tag as unprocessed flower.
- During processing Flower and Trim are separated and placed in separate packages.
- Finished packages are place in harvest storage.

TRANSPORTATION AND DISTRIBUTION

Transportation will be handled by a third-party, contracted, licensed transporter/distributor in accordance with State and Local regulations. Prior to moving packages from the on-site Harvest Storage Area to another physical location, a transport manifest will be created by the distributor/transporter and will include:

- Product ID numbers and product weight
- License information for Distribution, Transporter, and Cultivator
- License information and contact information for Driver and Vehicle.
- Route to be travelled
- Origin and destination addresses
- Time of departure
- Time of arrival

The Site Manager is responsible for performing a physical inventory of all packages being transported and ensuring that the physical inventory coincides with the transport manifest.

CULTIVATION AND OPERATIONS PLAN
Big River Farms, LLC

Appendix A. Site Plan



CULTIVATION AND OPERATIONS PLAN
Big River Farms, LLC

Appendix B: Cultivation Schedule

February 1-April 1st: Clone Propagation

All plant used in Big River Farms, LLC cultivation sites will be composed of clones taken from "mother" plants. Mother plants are composed of samples that have been deemed to demonstrate superior genetics for desired outcomes. Cuttings, or clones, are taken from the mother plants at various intervals. Mother Plants, Clones and vegetative plants are grown in the Ancillary Nursery Area.

Clones will be cut from mother plants and will be placed within trays to root. After approximately 2-3 weeks, rooted clones will be transferred to 5" by 5" pots within Ancillary Nursery green house to acclimate.

April 1 – April 15: Transplant Phase

When the plants have achieved desired height and plant growth density for transplant, the plants are immediately planted into 25" pots. Due to the increase in container size and increase in daylight hours, the plants will continue to grow in a vegetative state for 2-4 weeks. The approximate desired height and growth density would be 3'-4'. Upon final transplant, plants will be hand-watered and fertilized. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. Once the desired height and vegetative growth density has been achieved the Light Deprivation Phase begins.

April 15 – Jun 15: Light Deprivation Phase-Cycle 1

Taking into account factors such as height, growth density and overall health of the plant, determination of the exact date for the light deprivation process begins. Once that date is determined, 100% light resistant, specifically designed tarps will be automatically pulled over the outside of the greenhouses. This process will reduce the daylight hours from approximately fifteen (15) hours of daylight to the desired twelve (12) hours of daylight, twelve (12) hours of darkness desired to induce flowering. During the first two weeks of light deprivation, the plants will enter into a transitional phase. During this transitional phase plants will continue vegetative growth while transitioning into flowering.

It is not uncommon for plants to obtain 25% of their entire height and vegetative growth density during the transitional phase. Once the plants enter in the final bloom or flowering phase, they will begin to expend energy into the production of flowers, therefore, ceasing vegetative growth and begin to flower. The entire flowering process, including the transitional and final bloom phases, will last fifty-five (55) to sixty-five (65) days depending on strain variation and weather conditions.

June 15 – 22: First Harvest and Re-Planting

Once the light deprivation phase has concluded and it has been determined that the plants are at their peak, harvest procedures will be initiated. (See Section 2.4 of the Cultivation and Operations Plan). The soil in the pots will be turned and amended. All amendments used are in accordance with Humboldt County and State of California Department of Agriculture compliance. New clones obtained from the "mother" will be transplanted into the greenhouses.

CULTIVATION AND OPERATIONS PLAN

Big River Farms, LLC

Due to the length of daylight hours, the plants will continue in a vegetative state for approximately one month. Plants will be planted using the same methodology as with the Transplant Phase.

June 22 – September 15: Light Deprivation-Cycle 2

See Light Deprivation-Cycle 1 for a description of activities during this phase.

September 15 - September 22 – Second Harvest and Re-Planting

See First Harvest and Re-Planting for a description of activities during this phase.

October 1 – February 1st- Repair, Upgrade and Recondition Phase

Big River Farms, LLC will inspect all cold frames and covers for wear and replace as necessary. All watering hoses, etc. will be inspected and repaired or replaced, as appropriate. Refilling of irrigation tanks will commence in accordance with the Small Irrigation Use Registration and Conditions of the Department of Fish and Wildlife (DFW) Lake or Streambed Alteration Agreement (LSAA). Pots will be turned over and composted within the greenhouses to prepare for the upcoming season.
