ATTACHMENT 1B

Cultivation and Operations Plan



Cultivation and Operations Plan For

Bridgeville Organic Pharms, LLC APN 210-012-019 Outdoor/Light Deprivation

Located North of McClellan Rock off HWY 36 Bridgeville, California



Prepared for: Karen and Dennis Silva Humboldt County App #10822/CUP #16-157 Humboldt County APN: 210-012-019 Bridgeville, CA

> Updated by: Jack Skeahan, Project Geologist jacks@pacificwatershed.com Pacific Watershed Associates Inc. P.O. Box 4433, Arcata, CA 95518 (707) 839-5130

Description of water source, storage, irrigation plan, and projected water usage:

The water source is a 300-foot deep permitted bedrock groundwater installed on 6/29/2018 (see Exhibit A: Groundwater Well Information) by Fisch Drilling which is used to fill onsite water tanks during the wet season and as a backup water source during the dry season as needed. An additional surface water diversion water source is proposed for installation on a Class II, intermittent stream. The groundwater well is also used as a source for domestic water for employees when needed. For ease in using the attached Bridgeville Organic Pharms, LLC (BOP) Site Plan (Exhibit B), all water related features shown have blue call outs.

There are 31 plastic water tanks (refer to Exhibit B: Site Plan for water storage locations) with a total volume of 115,100 gallons of off-stream storage.

Current and proposed irrigation plan:

Currently all crops are irrigated in the first one or two weeks of the cultivation period using hand watering. Irrigation is then converted over to a drip irrigation system for the remaining portion of the cultivation period.

Water usage for the cultivation season:

- March: Minimal irrigation from storage
 - \circ Monthly = approx. 650 gallons.
- April: Propagation/immature plant irrigation from storage
 - \circ Monthly = approx. 1,100 gallons.
- May: Irrigation from storage
 - \circ Daily = approx. 195 gallons.
 - \circ Monthly = approx. 6,000 gallons.
- June: Irrigation from storage
 - Daily = approx. 330 gallons.
 - \circ Monthly = approx. 9,900 gallons.
- July: Irrigation from storage
 - Daily = approx. 395 gallons.
 - Monthly = approx. 12,232 gallons.
- August: Irrigation from storage
 - \circ Daily = approx. 750 gallons.
 - \circ Monthly = approx. 23,305 gallons.
- September: Irrigation from storage
 - \circ Daily = approx. 1,265 gallons.

- \circ Monthly = 38,000 gallons.
- October: Minimal irrigation from storage (harvest period).
 - \circ Monthly = approx. 3,300 gallons.

Total annual water usage: approx. 94,490 gallons per cultivation season (Note: the total annual water usage is based on 2021 irrigation volumes. Water use for previous cultivation seasons and square footage varies and the total volume above is not intended to reflect a maximum amount for each year's irrigation requirements).

Description of site drainage, including runoff and erosion control measures:

The cultivation location consists of natural low gradient benches with slopes ranging from 2% to <15% in gradient. Minimal grading has occurred in developing the cultivation areas on the property and the natural, dispersed drainage patterns are effective at protecting water quality and are resulting in no sediment delivery to the natural stream channels located well away from the cultivation and graded areas. Where one watercourse is near a cultivation area the low gradient areas are either basically flat or tend to drain away from the watercourse.

There are two, well defined Class II intermittent streams on the property, with the nearest one being more than 200 feet to the west of Cultivation Area #2 (CA #2; Exhibit B: Site Plan). The large buffer distance, the dense vegetation in the intervening hillslopes, and the well dispersed runoff patterns on the cultivation areas results in no sediment delivery to the streams on the property. The property was extensively logged about 40 years ago. As a result of the tractor yarding operations, a stream diversion did occur that created a man-made gully that is located about 60 feet to the southwest of the active areas at CA #2 (see Exhibit B: Site Plan). The gully no longer receives diverted stream flow, but emergent flow was observed in the channel near the graded pad at CA #2 after subsequent onsite observations, and the drainage beginning at the point of emergent flow is classified as a Class III ephemeral stream. Minimal sediment transport was observed in the channel and although the graded pad at CA #2 is within the 50-foot Streamside Management Area (SMA) cultivation activities have been relocated out of the 50-foot SMA and no runoff from the graded pad or cultivation area was observed to have potential to enter this watercourse. Additional erosion and sediment control measures and revegetation

There is a limited road network on the 70-acre forested property. Due to the recently installed road drainage features and the upgraded stream crossings on a previously constructed former logging road (see Exhibit B: Site Plan) the road system is well drained with frequent rolling dips and exhibits no sediment delivery to watercourses. A Lake or Streambed Alteration Agreement (LSAA), that included stream crossing and road drainage upgrade recommendations, was developed by Pacific Watershed Associates (PWA) and submitted to, and approved by, the California Department of Fish and Wildlife (CDFW). This plans also included recommendations to permit a future seasonal stream diversion and identified the presence and location of the existing groundwater well which is the sole source of irrigation water on the property (Exhibit C: LSAA).

Access to the property is via a 2.6-mile private gated road off California State Highway 36. The road passes through sparsely populated, private timber and ranch lands with frequent turnouts, and

is primarily used for ranching and timber management activities. No year-round residents use the road. (see Exhibit D: DPW Road Evaluation Report).

Protocols for proper storage and use of fertilizers and natural pesticides:

All fertilizers are either liquid organic nutrients, purchased in five-gallon containers or dry product purchased in 40–50-pound bags. All fertilizers are kept in original containers, grouped with similar products and stored in plastic storage bins with lids. The fertilizers are stored inside a 20-foot-long shipping container (see Exhibit B: Site Plan), in their original containers, and are neatly organized. The door of the shipping container is locked with a padlock for added security and to prevent access by unauthorized personnel and to protect wildlife. No dangerous or flammable materials are used or stored near fertilizers.

Insecticides, fungicides and pesticides are all natural products. Fertilizers are all organic. Fertilizer use consists of manually obtaining and transporting to the property what is needed. When using fertilizers, the products are transported to greenhouses in plastic storage bins to assure there are no leaks, spills, and nothing is allowed to reach the ground surface. Insecticides, fungicides, and pesticides are applied as directed following the manufacturer's recommendations on the container's label. The dry top dressings are applied every two weeks. The liquid nutrients are mixed in 1,500-gallon feed tanks once a week and the application is regulated to use just enough product as needed to prevent runoff. All fertilizer products are certified organic, and all brand names used on the property are environmentally friendly. Some of the brands we are using are as follows: Oyster Uprising Grow and Uprising Bloom, as well as our own formulas for compost tea and natural insecticide. Natural biological methods for pest control like lady bugs and praying mantis are also options for insect control. The cultivation areas are planted with marigolds to repel insects from the soil. These are a few of the natural options for insect and pest control.

Daily monitoring is vigilant in our pest control management plan. Due to the sensitivity of our cannabis crop production and use all efforts are employed to use all natural remedies to avoid chemical poisons.

Procedures for pesticide and fertilizer use and qualifications:

All pesticides, insecticides, and fungicides protocols are followed as directed on labels as per the manufacturer's recommendations.

All employees are provided with personal protective equipment (i.e., gloves, masks, respirators, safety glasses, etc.) when needed.

First aid kits and eye wash materials are available as well as literature on routine decontamination procedures, Safety Data Sheets (SDS), and pesticide safety information leaflets.

All pesticides, soil amendments, and fertilizers are left in their original containers and are marked and kept in locked storage areas. All proper handling instructions are followed while using these materials and directions for use are followed as per label instructions provided by the manufacturers.

Required signage:

COVID 19 Compliance:

Humboldt County Joint Information Center- 707-476-2429 Unincorporated county locations

Humboldt County Health- Mask Ordinance -signage 707-268-2900

Covid Prevention Emergency Standards

Cal/OSHA Model Covid-19 Prevention Program

Occupation Safety and Hazard Administration (OSHA) signage warnings; i.e., eye irritation and skin irritation.

***EPA Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). (see attached manuals and brochures)

Description of cultivation activities:

Bridgeville Organic Pharms, LLC. has submitted pre-2016 documentation for the farming of 40,025 ft² of cultivation, consisting of 22,875 ft² of outdoor farming and 17,150 ft² of light deprivation cultivation as our objective for full Phase 2 production on the property. For the 2021 Phase I efforts cultivation consists of 16,872 ft² of light deprivation cultivation and 4,610 ft² of outdoor cultivation, along with 1,920 ft² of immature plant area in two dedicated greenhouses at CA #3 (see Exhibit B: Site Plan). The light deprivation cultivation is occurring in seven greenhouses at CA #1 and CA #2 and the outdoor cultivation is occurring in nine hoop houses and four potted outdoor areas. See the attached Exhibit B: Site Plan for the locations and cultivation specific labeling for the following cultivation areas:

CA #1: Light Deprivation

Greenhouse #1: 16 ft wide x 85 ft long = 1,360 ft², Greenhouse #2: 24 ft wide x 86 ft long = 2,064 ft²; Greenhouse #3: 24 ft wide x 177 ft long = 4,248 ft².

All greenhouses are tarped. The greenhouses are planted in May, ready for harvest in July, and then replanted and ready for harvest again in October.

CA #2: Light Deprivation

Greenhouse #4: 24 ft wide x 170 ft long = 4080 ft²;

Greenhouse #5: 24 ft wide x 80 ft long = 1,920 ft²;

Greenhouse #6: 24 ft wide x 75 ft long = 1,800 ft²:

Greenhouse #7: 20 ftwide x 70 ft long = 1,400 ft2.

All greenhouses are tarped. The greenhouses are planted in May, ready for harvest in July, and then replanted and ready for harvest again in October.

Total Phase 1 2021 Light Deprivation: 16,872 ft²

CA #2: Outdoor

Hoop house #1: 8 ft wide x 78 ft long = 624 ft²; Hoop house #2: 10 ft wide x 45 ft long = 450 ft²; Hoop house #3: 8 ft wide x 20 ft long = 160 ft²; Hoop house #4: 10 ft wide x 28 ft long = 280 ft²; Hoop house #5: 10 ft wide x 32 ft long = 320 ft²; Hoop house #6: 10 ft wide x 38 ft long = 380 ft²; Hoop house #7: 10 ft wide x 48 ft long = 480 ft²; Hoop house #8: 10 ft wide x 66 ft long = 660 ft²; Hoop house #9: 8 ft wide x 52 ft long = 416 ft². Outdoor #1: 20 pots (6 ft diameter) = 560 ft²; Outdoor #2: 1 pot (6 ft diameter) = 140 ft²; Outdoor #3: 5 pots (6 ft diameter) = 112 ft²;

Total Phase 1 2021 Outdoor: 4,610 ft²

CA #3: Immature plant area (Light Deprivation)

Immature plant area A (northern greenhouse): 16 ft wide x 60 ft long = 960 ft²; Immature plant area B (portion of southern greenhouse): 16 ft wide x 46 ft long = 736 ft².

CA #3: Immature plant area (Outdoor)

Immature plant area B (portion of southern greenhouse): 16 ft wide x 14 ft long = 224 ft².

Both greenhouses are tarped.

Total 2021 immature plant area: 1,920 ft²

Total Phase 1 2021 Current Canopy Area: 21,482 ft²

Soils management:

Soils management is an ongoing process throughout the cultivation season. Soils are all different from one another. The average organic mineral soil is made up of 45% mineral particles, 5% living and dead organisms such as bacteria, protozoa, microbes, fungi and earthworms, and 50% air and water.

Three major factors contribute to cannabis roots to grow in soil: texture, pH, and nutrient content (organic and mineral). Because soil breaks down and becomes more compact over time and can become contaminated, we use soil amendments to address these issues. Brands we trust such as Big Worm and Oyster Uprising Grow worm castings and well-composted organic matter assist in amending the texture.

Located at each greenhouse the assigned farm employee uses one pallet of Big Worm and two 50pound bags of Oyster Uprising Grow. These materials are mixed in well until ready for replanting with clones from the immature plant areas.

After the plants are harvested the root balls are pulled up and placed in a designated area for composting. Worm castings are added, with Uprising Grow and organic oyster shells tilled into the soil bed. We use organic soil amendments.

Ongoing procedures for soil management:

Site employees collect daily soil samples and test the pH using litmus paper, then make appropriate adjustments as needed (ideal pH is between 6.0 and 6.5, a pH of >6.5 or around a pH of 7.0 is too acidic)

Site employees also monitor the soil temperature for control of nutrient uptake (optimal soil temperature is around 65-70 degrees Fahrenheit) for chemical activity, to avoid dehydration, and to control bacterial growth. Soil temperature that is too cold stunts plant development and growth.

Site employees also control both underwatering and overwatering to avoid root problems and stunting of growth. Site employees also monitor and adjust the soil amendments, check the water and nutrient-retaining abilities, and check for visible signs of plant stress, such as dry, crispy, or brittle leaves and/or yellow leaf edges. Examples of plant stress include burnt leaves, Chlorosis - yellowing between veins, irregular blotches, purple plant stems and leaf stems, curling leaves, and branch tips that stop growing.

Site employees also make appropriate adjustments to soil amendments as needed throughout the cultivation season.

Detail of measures taken to ensure protection of watershed and nearby habitat:

The cultivation sites are over 175-feet from the nearest Class II intermittent watercourse, and more than 50-feet from the nearest Class III ephemeral watercourse, and there is no runoff or erosion observed with the potential for sediment delivery to watercourses at any of the cultivation sites. The greenhouses are tarped at night and the generator is stored in a locked storage container and put on a metal tray when used to prevent any soil contamination in the event of a spill or leak of petroleum products. The smaller generator is kept off the ground in a woodshed and gas cans are always stored separately in a secure, ventilated area. Waste is collected, placed in trash bags, and removed daily by site employees at the end of their workday. Soil bags are stacked and covered at the end of the cultivation season in preparation for the next wet season. See attached reports for reference and details; PWA/Danny Hagans, Leopardo Wildlife Associates, Blair Forestry, DZC Archaeology& Cultural Resource Management.

<u>Schedule of activities during each month of the growing and harvesting season</u> <u>including projected generator use:</u>

February through March:

Weather permitting, clean up and repairs begin for the next growing season. Inventory of supplies and tools are taken to ensure a productive cultivation season. All greenhouses, canopies (tarps/plastic sheeting), and storage containers are checked and repaired as needed. Property cleanup of winter debris, such as tree branches, are removed and cleaned up. During this time we do soil preparation work and take inventory of the onsite soil amendments and nutrients. All health and safety equipment and signage is checked and replaced as needed to ensure proper health and safety for employees and working conditions. Immature plant area preparation is underway for the mother plants and cloning procedures. Our goal during the pre-season is to have our farm employees trained, certified, and familiar with all county and state regulated processes and with county, state and federal laws such as Metrc Track and Trace, weight master licensing, employee safety practices, and first aid (reference: Cal/OSHA health & safety practices, Performance Standards for Cultivation and Processing Activities)

In March, we begin the process of cultivating by cloning the mother plants. The process of making clones takes between 7- 10 days to root a clone. Clones are cuttings from the mother plant and need proper temperature, lighting and soil to ensure the success of the plant species.

All farm employees must adhere to the safety and cleanliness standards stated below.

All employees will follow all cultivation operations and processes as shown in the Performance Standards for Cultivation and Processing Activities (*see Humboldt Cannabis Ordinance Section* 55.4.11).

Processing practices:

- Wash hands regularly.
- Disinfect all tools and work surfaces to kill bacteria, fungi, viruses and other diseases. Sterilize tools such as scissors, razors, or razor blades with rubbing alcohol.
- Site employees confirm that all cloning materials are in close proximity before starting to take clones, such as rooting cubes, rooting hormones, razors or scissors, humidity dome, etc.

To avoid issues:

- Keep work area CLEAN. Wash work surfaces and tools before starting.
- Have growing medium handy. Prepare the mother plant in advance.
- Take clones with clean (sterile) instruments. Store cut clones in water.
- Stick clones in cutting and growing medium. Place clones under a humidity dome.
- Monitor growing medium moisture levels and humidity. Watch for root growth.
- Transplant clones when roots emerge.
- Harden-off clones by gradually exposing cuttings to their new environment.

Weather plays a major role in the success of our crop. Clones are always started in the sterile immature plant area. Clones take roughly 36 days to grow to a height of approximately two feet. Designated employees maintain care of the mother plants to ensure the quality and care of the clones. Clones are kept under artificial light 24 hours a day until the roots stretch (approx. 7-10 days).

Generator use in the immature plant area will be 24 hours a day during the cloning process. Each strain will be identified and tracked by a unique serial number. Once the clone leaves the nursery each plant is individually tagged for compliance with the Track and Trace program. (See Exhibit B: Site Plan for the immature plant areas).

April:

In April site employees spend most of the time working in the immature plant area caring for the clones. About a week after being taken, clones develop a stubby, callused root called primordia. The clone will produce very little green growth at this stage. Leaves and the severed stem now supply fluids for the clone. Once a root system is established the clones start the "vegetative" state. Supplemental lighting (small fluorescent string lights) will be used and will be powered by the generator. As soon as the root system is established the duration and rate of light and nutrients is increased. Soil amendments, increased lighting to maximum levels, and changes in fertilizer solutions are implemented accordingly.

May:

By May site employees begin to transplant the clones to their respective greenhouses. At this stage the clones are mature enough to be identified, tagged, and inventoried by species. At this point all plants will be tagged for the Metrc Track & Trace Inventory System. Our employees are over 21 year of age and all employees are responsible to follow the County and State laws regarding cannabis cultivation. Part of their job responsibilities include tagging the cannabis plants when the plant has reached approximately 24 inches in height. We have hired an additional staff member who is responsible for plant tags, ensuring appropriate Chain of Custody procedures for cannabis tracking are followed, and any other reports, tracking manifests, etc. are developed and submitted as needed. In preparation and as the busy season approaches, we will add two more employees and during harvest, will hire additional employees as needed.

Site employees will follow all cultivation operations and processes as shown in the Performance Standards for Cultivation and Processing Activities (*see Humboldt Cannabis Ordinance Section* 55.4.11).

In the immature plant area care for the "vegging" clones continues. The clones are assigned to their respective greenhouses, hoop houses, or outdoor areas, once they are at least two feet in height. This is a continual process of watering, fertilizing, adding soil amendments, and implementing pest control measures to increase growth and promote flowering. Pruning, bending, and super cropping will be used to increase yield and control the shape and direction of plant growth. Around this time all plants are covered in light deprivation plastic during the period from 7:00 p.m. to 7:00 a.m. in a 12 hours of light/12 hours of dark cycle to induce flowering. The light-deprivation cycle continues for nine weeks.

Our full-term outdoor plants are planted at this time. Soil amendments and water pH levels are exceptionally important with the outdoor plants. Cannabis does best with a soil pH of 6.5. Site employees regularly monitor the pH levels of the soil and water, and the watering schedule is maintained or increased as needed and recorded daily.

June:

In June our light deprivation greenhouses begin flowering and tarping of the greenhouses continues. At this point site employees are pulling "blackout" tarps over greenhouses in the evening and pulling them off in the morning. Cultivation on this site depends on natural light. Site employees continue to monitor watering, fertilizing, soil amendments, and pest control. Daily inspections of flower growth and plant maturity are conducted to ensure no premature harvesting occurs. Site employees also prune the lower branches of the plants to produce a healthier and heavier harvest.

July:

Site employees continue to regulate the light deprivation cycle. With the nine-week tarping cycle now complete, harvesting commences in the greenhouses. The soil is amended to prevent clumping and contamination and to make sure pH levels are at optimal growing conditions. Site employees continue watering, fertilizing, and pest control activities. By the second week of July, clones from the immature plant areas are relocated to the light-deprivation greenhouses. As described above, all cultivation operations and processes continue.

August:

In August the first matured plants are harvested and hung in the drying sheds (see Exhibit B: Site Plan). The drying sheds are always kept clean and sanitized on a regular basis. Before the plant is hung to dry and while still fresh the leaves that surround the flowers are removed (manicured). Plenty of light is needed to manicure and employees are provided headlamps to ensure proper lighting for this process. The plants are dried for about two weeks.

We use electric heaters to maintain a constant temperature of 75 degrees in the drying sheds. A generator is used to run fans and de-humidifiers in the drying shed, as well as the electric heaters, to ensure the high quality of the cannabis product is maintained. At this point there will be on average a 4-person work crew for manicuring, trimming, and harvesting of cannabis.

The second round of light deprivation plants are planted, they "veg" for two weeks and then we begin the controlled light cycle again by removing tarps in the evening and pulling them back on in the morning. All cultivation operations continue as noted above.

September:

Watering, fertilizing, and pest control continues. Tarping is discontinued around the second week of September as the days are short enough to flower naturally. Mother plants will be moved to the immature plant area.

October:

Watering continues. In the second week of October the final harvest process begins on all plants. Processing of cannabis is done onsite in the two drying sheds. All plants are individually cut down and hung on drying lines in the drying sheds. We use electric heaters and fans run by generator to circulate air and maintain an optimal temperature. After the plants are dry, they are put in plastic totes and stored in the drying sheds until trimming commences. At this time our work force is increased slightly to 4-6 employees.

Harvesting the cannabis is done as plants mature and ripen. Harvesting the ripe flowers allows the smaller, more hidden flowers a chance to fully mature. Harvesting in this manner allows for a significant potency increase due to increased time for the flowers to ripen and provides a more significant harvest. The investment of this additional time results in an increase in labor needs. Manicuring is the process of removing leaves for the flowers. The best time to manicure is when the plant is fresh picked, allowing the THC and terpenes to be pliable. Manicuring continues by removing (i.e., cutting) all branches, sun leaves, and smaller leaves called trim from the bud. The trimming space must be clean and sanitary. Each employee that manicures the plants has their own manicuring tools, gloves, masks, and other protective clothing. All whole plants are hung, cut to manageable sizes, and stored at cooler temps to keep the plants fresh.

The processing area consists of chairs, lighting, tables, sanitized tools, and clean containers for processed plants. The drying sheds are where the processed flower is stored and is kept undisturbed until ready for packaging. No food or drinks are allowed in the processing areas. The generator will be used around six hours a day to run lights and fans while the employees process the flower. Generator use will continue for 3-4 weeks while processing is underway. One regularly serviced portable toilet is onsite during the cultivation season (see Exhibit B: Site Plan). During the busy season, we rent portable handwashing stations.

We also built a new bath house in 2020. It is currently not connected to the OWTS and not in use.

Sanitizer and disposable gloves are provided to site employees throughout the cultivation season. Clorox wipes, disinfectants, hydrogen peroxide, and alcohol for sterilizing tools and equipment are also provided.

All processing areas are cleaned daily and are kept sanitary. All trash/refuse is transported off-site on a weekly basis by site employees leaving the property. All tools and workstations are cleaned and sanitized to be ready for the next day of work.

An itemized list of additional tasks for site employees are listed below which may occur throughout the cultivation season as needed:

- Trellising
- Harvesting/hanging
- Top dressing
- De-leafing
- Bucking
- Mixing nutrients/testing pH of irrigation water
- Amending of soil
- Watering
- Topping plants

- Transplanting
- Spraying
- Construction/maintenance/repair of greenhouses and hoop houses
- Regular site cleanup and property maintenance
- Drip irrigation system set up and maintenance
- Harvesting and processing

All employees will follow all cultivation operations and processes as shown in the Performance Standards for Cultivation and Processing Activities (*see Humboldt Cannabis Ordinance Section* 55.4.11).

Summary of processing practices:

We are a family run business and hire seasonal employees for processing as needed. As the cultivation season progresses our work force will be increased from a two-person team to 4-6 additional employees for processing. We do not have living quarters on the property and employees arrive by car daily to work.

Drying and processing is done in the two drying sheds (see Exhibit B: Site Plan). All employees handling cannabis wear face masks, gloves, and personal protective equipment which are kept in good working condition. All work surfaces are kept clean and sanitary. To prevent contamination during processing gloves are worn and hands are washed frequently. Each employee working on processing is assigned an area to work and is responsible for following clean habits to prevent cross-contamination. Each processor has their own tools and is responsible for disinfecting their tools and sanitizing their work area. Bottled water is stocked for drinking. Scheduled servicing of the portable toilet will be increased based on the level of use by Six Rivers Portable Toilets. Additional washing stations can be rented to maintain a high level of good hygiene and to make water available for all cleaning situations that may arise. Three gallons of water per employee while working with cannabis is estimated and available to maintain a high level of cleanliness. The average daily use of the access road is approximately one to two vehicles. There is no traffic other than site employees and the occasional rancher or property owner on the access road to the property. There are suitable regular and handicap parking spaces designated as required (see Exhibit B: Site Plan).

Employee safety practices:

All employees are given training either off-site or on-the-job for their specific employment responsibilities. Some of the items to be addressed and implemented are as follows:

Employee guidelines and employment requirements

Operational Guidelines & Procedures

Emergency procedures

Accident reporting, prevention and follow up policies

Fire prevention

Hazard policies and maintenance of materials

Job hazards and solutions

Personal protective equipment policies, including respiratory protection

Cleanliness in the workplace environment guidelines

All employees will follow all cultivation operations and processes as shown in the Performance Standards for Cultivation and Processing Activities (see Humboldt Cannabis Ordinance Section 55.4.11).

References

For Employee's Safety: follow the guidelines from OSHA General Duty Clause - sec. 5: to keep work areas free from recognizable hazards that are causing or likely to cause death or serious harm to employees. Sensitivities/allergens (dermal) itchy skin, swollen eyes, hives; use gloves, clothing, face masks to protect from direct contact of the plant; make sure areas are well ventilated.

All employees-will follow all cultivation operations-and processes as shown in the Performance Standards for Cultivation and Processing Activities (see Humboldt Cannabis Ordinance Section 55.4.11).

Employee safety protocols;

Cal/OSHA resources:

California Code of Regulations, Title 8

Cal/OSHA Marijuana/Cannabis Industry Advisory meeting website

Cal/OSHA publications - To assist employers with various regulations

Health and Safety Rights: Facts for California Workers

User's guide to Cal/OSHA

Posted and up-to-date emergency contact list

Best Management Practices Manual for Cannabis Cultivation: Best Practices

North Coast Regional Water Quality Control Board Cannabis Cultivation Waste Discharge Regulatory Program: Cultivation Waste

Program training:

Weights and Measures Programs Pesticides, Insecticides, and Fungicides training

First aid course

Statement of Compliance:

Cultivators shall comply with all applicable federal, state and local laws and regulations governing California Agricultural Labor Relations Act which may include: federal and state wages and hours laws, CAL/OSHA, OSHA, California-Agricultural Labor Relations Act, and the Humboldt County Code (including the building code).

Facilities:

There is no onsite housing for employees. There is one portable toilet that is serviced monthly at a minimum and more often as needed based on the level of use. There is also a bathhouse on the property that will be connected to an updated septic system once county permits are issued and the septic system is installed. One wash station is currently on the property near the canvas tent west of the southern drying shed and additional wash stations will be provided, if necessary, based on the level of use. Facilities currently accommodate the number of employees. The wash station has a sink for hand washing and an anti-bacterial soap dispenser. At least three gallons of water per person per day is available at the hand washing station. An adequate supply of bottled water for drinking is also kept onsite and readily available. Employees will drive to the work site daily.

Projected generator use:

There are three generators in use on the property. The large 25-kilowatt generator is used to power lights and fans which are used mostly for processing and harvesting. When using the smaller generators, they are placed on metal trays so that when adding gas or oil any spilled materials are contained and no hydrocarbons are allowed to contaminate the soil. The large generator is equipped with an integrated secondary containment basin/spill tray. When not in use the generators are placed under cover in a canvas tent or in the plastic storage shed (see Exhibit B: Site Plan) and protected from the elements. There is a smaller portable generator that is kept in the storage shed and used for the groundwater well pump as needed. Fuel cans are kept in the plastic shed (see Exhibit B: Site Plan). Use of the generators is between 6-8 weeks during the cultivation season, for approximately 6-8 hours per day, except when used for the groundwater well pump as needed. The generators do not generate a significant amount of noise. There are three generators used onsite: WhisperWatt (25-kw), and Honda EU3000 and EU7000 models and these generators are very quiet (see Exhibit E: Generator Specifications).

Security Plan:

The property (APN 210-012-019) is located at the end of a 2.6-mile-long private road that intersects with California State Highway 36. The access road to the property includes three locked gates and traverses six other neighbors' properties. The road is passable by all types of vehicles, including passenger vehicles, at all times of the year except during heavy rain events.

All cannabis will be stored in locked, metal, fireproof storage containers or locked in the drying sheds during processing (see Exhibit B: Site Plan). The property is in a very remote location with one way access. No persons under 21 years of age are allowed on the property.

Fire extinguishers are strategically placed on the property, available at all times and maintained and/or replaced as needed.

Emergency Contact List: Operations Manager: Karen Silva 916-642-0540

Emergency Responder Contacts: CalFire Del Norte Unit- Fortuna, CA (707) 725-4413 118N. Fortuna Blvd. Fortuna, CA 95540

North Coast Emergency Medical Services (707) 445-2081

Eureka Public Health 707-445-6200 529 I St. Eureka, CA 95501

Poison Control: Emergency hotline: 1-(800) 876-4766 1-(800) 222-1222

Adherence to the Dark Sky Association Statement:

Artificial light disrupts the Earth's ecosystems. Plants and animals depend on the Earth's daily cycle of light and dark to govern life-sustaining behaviors such as reproduction, nourishment, sleep, and protection from predators. Humans have radically disrupted this cycle by lighting up the night.

Our goal at Bridgeville Organic Pharms, LLC. is to maintain the ecosystem and protect the night sky. We will do our part in keeping the night sky visible and free of BLUE light interference/pollution by adhering to the guidelines set up by the Dark Sky Association.

Our Light Pollution Prevention Standards are as follows:

No use of BLUE (LED) lights at night. When using artificial light, we will use red or yellow lights with longer wavelengths which are less visible to our wildlife neighbors and have less impact on light pollution. We adhere to the practice of tarping our greenhouses and follow a "12 hours on - 12 hours off" light deprivation schedule.

All lights are shielded and oriented face down to help with light pollution, glare, and clutter.

Long-Term Public Health Concerns:

In March 2018, PWA conducted Onsite Wastewater Treatment System (OWTS) field investigations on the BOP, LLC property that included onsite soils analysis and mapping, topographic mapping, and wet weather (percolation) testing. Exhibit F is a letter from Kathy Moley of PWA stating that the property is suitable for the development and construction of an OWTS. PWA is in the process of finalizing the OWTS designs for submittal to the Humboldt County Division of Environmental Health (HCDEH).

Previous Timber Harvesting on the Property:

See Exhibit G for a Timberland Conversion Evaluation Report prepared in November 2018 by Blair Forestry Consulting for the BOP, LLC property.

Exhibits:

Exhibit A: Groundwater Well Information Exhibit B: Site Plan Exhibit C: LSAA Exhibit D: DPW Road Evaluation Report Exhibit E: Generator Specifications Exhibit F: OWTS Suitability Letter Exhibit G: Timberland Conversion Evaluation Report