

## OPERATIONAL MANUAL

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California; and as such proposes the following Operational Manual.

### PURPOSE

The Operations Manual is designed to outline the operating procedures of the commercial cannabis cultivation site to ensure compliance with the use permit, protect the public health, safety and welfare, as well as the natural environment of Lake County.

### SCOPE

The Center Grow Operational Manual focuses on:

- Authorization for the County, its agents and employees to verify all information in the use permit
- A description of staff screening process
- Hours and day of operations
- Measures taken to minimize carbon footprint
- Chemicals stored and used on site All employees are required to follow the procedures outlined in this plan.

### AUTHORIZATION TO VERIFY

Center Grow authorizes Lake County agents and employees to seek verification of the information contained within the development permit or use permit applications, the Operations Manual, and the Operating Standards at any time before or after development or use permits are issued.

### STAFF SCREENING

All Center Grow employees will be required to submit fingerprints for a Live Scan criminal history search to be administered but the Lake County Sheriff's Department. Potential employee's must be approved by the LCSD to submit an application for employment. Prospective employees will be asked to submit a formal resume for review which includes education and work history, a statement as to why the employee would like to work for Center Grow, three professional references, and three personal references. Prospective employees whose applications and references have been approved will be granted a formal interview by Jason Jones. Meeting will include presentation on general job description, responsibilities, pay scale, schedule, operating procedures, and additional company benefits. Employees will be notified within seven business days as to whether they will be hired. Center Grow will use an online payroll platform or vendor such as PayChex or Wurk which provides cannabis companies compliance support from the interview to paycheck and taxes. We will use this system to track prospective employees, pay salaries; and save relevant information including background check results.

#### FACILITY OPERATING HOURS

Monday-Saturday 7am-8pm. Facility will be open to authorized staff, deliveries, and pickups. Facility will be closed to the public.

#### FACILITY CARBON FOOTPRINT

Center Grow recognizes that the most sustainable source of power is the sun, and is committed to growing 100% sun grown cannabis, with as little supplemental lighting as possible. Efforts will be made to minimize the use of fossil fuels through adaptation of green technologies, and equipment used that produce emissions will be regularly maintained and adhere to all applicable emissions standards.

#### CHEMICAL STORAGE AND EFFLUENT

Center Grow uses Organic farming practices. Organic farming means that no chemical products are allowed for use in the cannabis facility, and no such chemicals will be stored on site. Nontoxic alternatives to conventional cleaning products and building materials will be sourced and used whenever possible. The facility may use small volumes of chemical sanitation products to maintain a sterile work environment inside the facility. These chemicals will be stored in the manner and location described in the Hazardous Waste Plan. No effluent is expected to be produced at the facility.

#### SITE MAINTENANCE PROTOCOL

When not in use, all Center Grow equipment, will be stored in the proper designated area upon completion of the task required. Employees will conduct a daily scan of the site to ensure all materials used during the work day have been return to designated storage area in an organized fashion. Any refuse created during the work day will be placed in the proper waste disposal receptacle at the end of each shift, or at a minimum at the completion of the assigned task. Any refuse which poses a risk for contamination or personal injury shall be disposed of immediately. While Center Grow allows grasses and cover crops to grow tall during the rainy season as a soil building technique, when spring seasonal work begins, site will be mowed and trimmed to ensure safe and sanitary working conditions.

Roads, parking areas, and yards shall be maintained at all times to prevent particulate generation and potential illicit discharges of storm water. Adequate drainage features will be installed at the time of construction and gravel surface will be maintained as needed. Rolling dips, out sloping and vegetated swales will be used as potential drainage features if the cultivate site shows signs of poor drainage. If swales are used, infiltration basins will

be added to avoid storm water discharge.

The gradual slope of the proposed cultivation site makes it unlikely that the site will require specialized drainage features. Vegetated ground cover will be established over the entire site as soon as possible, and the site will be surrounded on all sides by a densely vegetated buffer strip capable of absorbing any sheet flow or runoff from the site. If the site exhibits poor drainage, techniques mentioned above will be developed. If the site requires a wastewater treatment facility, the facility will be designed, constructed, and maintained to ensure sanitary working conditions, eliminate the possibility of contamination, and protect working and consumer safety.

#### EVALUATING PERFORMANCE AND REPORTING OF THE OPERATIONS MANUAL REVIEW

Center Grow Director of Cultivation, Noah Cornell, will perform a weekly inspection of the cultivation site to ensure the guidelines of the Operations Manual are being carried out successfully, and the notes shall be logged in the Operations Manual, which is to be kept on site. Any poorly performing elements of the system or improper employee conduct will be corrected. If construction of drainage features or construction is required, all necessary permits and approvals will be acquired from the appropriate agency.

#### PEST MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permits (Type 3A) in Lake County, California. Center Grow will implement the following Pest Management Plan.

#### PURPOSE

The Pest Management Plan (PMP) is designed to ensure that in the use of pesticides, they are used only after monitoring

Cultivation.

#### EMPLOYEE TRAINING

Center Grow does not intend to use any pesticides in its cultivation of cannabis. However, in the event that such pesticide use is required, any employee who has direct contact with pesticide-treated plants must have completed safety training pursuant to the U.S. Environmental Protection Agency (USEPA) Worker Protection Standards, 40 Code of Federal Regulations, Section 170.130. Any employee who is involved in the application of the pesticide or handling of the pesticide or equipment must first complete Pesticide Handler safety training described in 40 Code of Federal Regulations, Section 170.230. Each employee training record will be verified by the employee's signature, and a copy of this record will be maintained on-site for at least 4 years after the term of employment.

#### SECURITY MANAGEMENT IMPLEMENTATION PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California. Upon receiving receipt of this permit Center Grow will implement the following Security Management Plan.

#### PURPOSE

The purpose of the Security Management Plan (SMP) is to minimize criminal activity, provide for safe and secure working environments, protect private property and prevent damage to the environment.

Center Grow's Security Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

## SCOPE

Center Grow Security Management Plan focuses on the following: A description of security measures to prevent access to unauthorized personnel and protect employees including fences, sign-in/sign-out procedures, locks and alarms. A description of security measures to prevent theft or loss of cannabis and cannabis products.

All employees are required to follow the procedures outlined in this plan.

## OVERVIEW

Center Grow's Security Management Plan includes best management practices that have been established in the cannabis industry and that pertain specifically to the safe and secure operation of a cultivation site, as well as the secure storage of all cannabis and cannabis products.

The Security Management Plan is also compliant with the Emergency Regulations for Cannabis Cultivation, authored by CalCannabis, as well as the regulations established by the California Department of Public Health for state-licensed cannabis businesses.

Center Grow understands the importance of a secure property and secure cultivation site for the safety of employees and the community.

## SECURITY (BMPs)

The driveway to the property has a locked gate at the entrance and there are other lockable gates on the way to the site.

There will be no signage with the business name or signage that could otherwise be discerned by the public to indicate cannabis

cultivation activities. The security camera system will record activities within the cultivation site and immediately outside of the site 24 hours per day, 7 days per week.

The security camera system will allow for remote monitoring and maintains records for 30 days minimum. All cultivation operations are performed within an enclosed site, secured with commercial grade locks. The site is located on a property with permanent residence and will be occupied by a designated employee daily and nightly.

#### ON SITE SECURITY

The Cultivation Site will be protected by a 6' wire perimeter fence, with cemented metal posts on 8' intervals. All terminal posts will be set in concrete. The site will be screened from public view by elevation, 90% sunblock mesh and chaparral shrub. The entrance to the site will be secured by a 6'6" metal gate and remained locked by a commercial lock, at all times when no staff is present.

The site will also feature a video monitoring system with full view of the cultivation area, infrared capability, motion sensors to alert management of intruders, and the ability to address potential intruders via loud speakers built into the video monitoring equipment.

The processing facility, located inside the fencing, will also remain locked when no staff is present. All access points in and out of the processing facility will be locked by commercial locks and have a security cameras recording all entry and exit points into the facility.

#### SUSPICIOUS ACTIVITY PROTOCOL

All suspicious activity will be recorded via security cameras. In the event that law enforcement is required, the designated Center Grow employee will notify the Lake County Sheriff's Department,

and other agencies as appropriate as quickly as possible. The designated employee will then file a suspicious activity report, noting the time and date of the activity and keep record in a secured room on site.

If suspicious activity could result in injury or death of employee or employees, all employees will be evacuated from the premise until activity is controlled or intruder is captured.

If the suspicious activity is believed to be from an employee of Center Grow, Jason Jones will review all security tapes which record areas where suspicious activity may have occurred. If tapes show suspicious activity was perpetrated by an employee, the employee will be asked to leave the premise and relinquish badge and access to the property. If security personnel are necessary on site for the removal of the employee, they will be notified.

If suspicious activity is believed to be conducted by a visitor, designated employee(s) will review the tapes and notify the visitor of our findings. Depending on the severity of the activity, law enforcement will be notified and charges will be filed against the individual or party. The person or party will no longer be allowed on property.

Breach Procedures (BMPs): Property Breach: if an unauthorized individual gains access to the property, local law enforcement will be notified immediately. Jason Jones or the designated employee will determine if it is necessary to cease operations; and if necessary, notifications will be sent to all employees whom will enter nearest operational room and will lock doors and turn off lights; when determined safe, Jason Jones or the designated employee will notify all employees.

Digital Breach: Jason Jones will immediately assess any damages and losses incurred from the event and will determine



an operational recovery timeline; and will investigate all digital records, data and systems to ensure that no cyber-theft or damage has occurred and investigate all cloud-based backups to ensure that no damage has occurred.

## VISTOR LOG REQUIREMENTS

Center Grow will maintain an employee and visitor arrival and departure log, which contains, the name of the visitor, date and time of arrival and departure, and the purpose of the visit. All logs will be kept in a secured office only accessible by Center Grow management team, in particular Jason Jones.

## THEFT AND LOSS PREVENTION (BMPs)

Center Grow employees and visitors will be under video surveillance at all times. All cannabis will be stored in a locked, secure room, accessible only to farm management. Other anti-diversion methods include:

Supervising tasks or processes with high potential for diversion (including the loading and unloading of cannabis transportation vehicles). Providing designated areas in which personnel may store and access personal items. No visitors will be allowed to the facility, with the exception of local and state agency representatives authorized to act on their behalf. Only employees with scheduled shifts may enter the property; and each employee will be required to be been checked-in properly.

Additional surveillance cameras will, additionally, be installed in areas used for employee parking in or around the cultivation site. All employees will be trained to identify suspicious activity and suspect individuals loitering around the property.

Only Center Grow management team will be allowed to access the vault or storage for any harvested cannabis. Surveillance cameras will be installed throughout the secure storage areas,

including each point of ingress/egress as to capture facial details, and allow for facial recognition as well as in all rooms where cannabis is handled.

All cannabis will be weighed, documented and logged at each stage of the processing phase, which includes drying, trimming and curing. Each plant and batch of cannabis cultivated will be properly tagged and assigned a unique identification number (UID). In addition to Track-and-Trace, an inventory tracking system will be established to prevent diversion. At the end of each day, Director of Cultivation, Jason Jones will inspect secured rooms and record inventory on a log. All in/out of inventory will be recorded on a log, as well. These logs will be kept in secured room with extremely limited access.

#### EMPLOYEE VETTING – LOSS PREVENTION

Center Grow will conduct extensive background checks of all employees hired on a full- time or seasonal basis to ensure they are in good standing with the law and do not have a previous history of theft, violence or major offenses. All employees and managers are provided a badge or ID issued by Center Grow with required information to be worn when in restricted on areas on the farm. Information includes Center Grow's name and license numbers, employees first and last name, and a color 2 inch by 2-inch photograph that shows the employees face.

All employees must wear their approved Employee Photo ID Badge at all times while at the cultivation site. No access to operational areas of the facility will be allowed to any employee not in possession of or wearing their ID Badge. The badge must be worn above the waist and be visible at all times.

Any employee who forgets his/her badge should immediately notify a manager to have the shift rescheduled. Only Center Grow management team will be granted access to the secure storage

rooms and secure storage vaults located on-site.

#### RESTRICTED AREAS – LOSS PREVENTION

The restricted areas include the cultivation site, the processing facilities, on-site office and any area with company records, access to security cameras or information related to Center Grow. All restricted areas and point of entry and exit on the premises are securely locked using commercial-grade locks.

Center Grow prevents the unauthorized entrance into restricted areas within the farm by controlling access to those areas by:

Limiting access to only certain personnel and for the sole purpose of executing their specific job function and duties

Any person on the premises, except for employees and contractors of the licensee, are escorted at all times by the licensee or at least one employee of the licensee when in the limited-access areas of the premises

#### CHAIN OF CUSTODY (BMPs) – LOSS PREVENTION

While in transit, raw materials and cannabis products are the most vulnerable. In particular, shipping, receiving and finalizing cannabis transactions present a security threat to Center Grow cultivation facility.

The following practices, therefore, shall be employed:

- All shipments—incoming and/or outgoing—will occur on a scheduled basis. No unscheduled shipments will be received or sent out for delivery.
- Center Grow management team will verify the vendor's identity by requesting government-issued ID and checking information against a manifest of vendor drivers. Center Grow management team will inform site

supervisor that a vendor is present and escort the vendor into the facility. All shipments will take place in areas that are covered by video surveillance.

- All outgoing products will be tracked and documented using the Track-And- Trace system.
- All shipments will be verified against the shipping manifest to ensure the accuracy of the items received/being distributed - any discrepancy will result in a cancelled transaction.
- All discrepancies will be reported immediately to a member of Center Grow management team.
- All discrepancies are to be reported to the appropriate law enforcement, local and state agencies.
- In the case of any theft, Center Grow will notify the local law enforcement and/or the state bureau.

## VIDEO SURVEILLANCE

The facility will be protected by a video surveillance recording system that will monitor the entire perimeter and inside of the cultivation site, inside processing facility, the security fence, and all gates and right-of-ways in order to capture all activity in areas where cannabis is handled, tested, cured, processed or stored.

Surveillance will be conducted 24 hours a day, 365 days a year, without interruption. All video surveillance recordings will include a date and time stamp for every recorded frame, and are designed to record images in high quality and high resolution to clearly capture revealing facial detail.

Video Surveillance: The site will have a complete digital video

surveillance system capable at a minimum of 1080 pixel resolution. The surveillance-system storage device or the cameras are transmission control protocol/ TCP/capable of being accessed through the internet for remote access 24/7. All areas recorded by the video surveillance system have adequate lighting to allow the surveillance cameras to effectively record images.

Cameras are immobile and will be installed in a manner to prevent tampering. Cameras are placed in a location that allows the camera to clearly record activity occurring within 20 or more feet of all points of entry and exit on the licensed premises, and allows for the clear and certain identification of any person and activities in all areas required to be filmed under subsection.

The following areas are recorded:

- Areas where cannabis goods are weighed, packed, stored, quarantined, loaded and unloaded for transportation, prepared, or moved within the premises;
- Areas where cannabis is destroyed;
- Security rooms;
- Areas storing a surveillance-system storage device with at least one camera recording the access points to the secured surveillance recording area;
- Interiors and exteriors of all entry points of the site and buildings. Cameras record continuously 24 hours per day at 30 frames per second. All interior cameras (if any) will be moisture proof and all exterior cameras will be water- proof, I-66. Cameras with infrared capabilities will be used for the perimeter fencing;
- All cameras will include motion activated sensors. All cameras will have color capability, record digitally and

be capable of integrating with door alarms

In areas with inadequate lighting for the cameras being used, sufficient lighting shall be provided to illuminate the camera's field of vision or night or infrared cameras will be utilized. The physical media or storage device on which surveillance recordings is stored and is secured in a manner to protect the recording from tampering or theft. Surveillance recordings are kept for a minimum of 30 days and recordings will be kept in a secured room in a controlled environment, separate from the rooms where the computers and monitor system are located

Videos will be available for inspection by local law enforcement or state bureau employee(s), and can be copied and sent or transferred upon request.

#### INFORMATION TECHNOLOGY SECURITY (BMPs)

Center Grow has developed the following contingency measures to ensure the security of digital records and systems that are vital to the operation of the facility. In the event of flood, fire or theft, these contingencies will allow us to resume operations as soon as operationally possible. All digital records and systems that are vital to Center Grow will be backed-up on a weekly basis. The data backup will be stored off-site, on a cloud-based server accessible only to management level employees

Access to digital records and systems will be highly regulated. No visitors will be allowed in the secure storage areas, operational areas, or any area where digital recordkeeping takes place. Employees will be trained on the importance of maintaining the security of all digital records and systems, and will be required to sign a form of acknowledgment testifying that they have been trained, understand and are aware of all digital security measures and all access control policies.

## SECURITY PERSONNEL

If Jason Jones and management deem that outside security personnel are necessary, Center Grow will engage a local security company for security personnel to provide security services on the premises when an emergency response is necessary. All security personnel hired or contracted by Center Grow comply with Chapters 11.4 and 11.5 of Division 3 of the Business and Professions Code.

## REVIEW

Center Grow will commission an independent annual inspection to evaluate whether the installed equipment should be updated and to review maintenance routines.

Emergency Contact Personnel:

*Jason Jones (707) 530-5681; email [Jasonjones411@yahoo.com](mailto:Jasonjones411@yahoo.com)*

Use. These include:

- Cannabis Cultivation Policy & California State Water Resources Board;
- California Code of Regulations, Title 3 Food and Agriculture, Division 8 Medical Cannabis Cultivation, Section 8107;
- County of Lake Ordinance 3703;
- Division of Water Rights, Principles and Guidelines for Cannabis Cultivation.

#### REVIEW

Director of Cultivation, Jason Jones will review the Water Use Plan on an annual basis and will share data relating to the cost of implementing this plan with the County as requested.

#### AIR QUALITY MANAGEMENT PLAN

Center Grow is applying for a Commercial Cannabis Cultivation Major and Minor Use Permit (Type 3A) in Lake County, California.

#### PURPOSE

Center Grow's Air Quality Management Plan (AQMP) is designed to promote the health, safety, welfare; environmental quality, and reduce potential for nuisance.

Our Air Quality Management Plan includes measures to monitor and evaluate the performance and implementation of the plan, as well as ensure that all data and information is reported to the appropriate local agencies.

#### SCOPE

The Center Grow's Air Quality Management Plan is as follows:



- Identifying equipment and activities which may cause odor, contaminants, or other air quality nuisance;
- Establishing responsible parties and best management practices if nuisance complaints occur. Mitigating the amount of air pollution and particulates that are generated and emitted during the build-out and expansion of Center Grow's cultivation site;
- Minimizing employee exposure to contaminants and particulates that may be harmful to their health, including areas where cannabis plant may be dried, cured, trimmed, packaged or handled. All employees are required to follow the procedures outlined in this plan.

## OVERVIEW

Center Grow will cultivate cannabis using organic methods and preventative pest management strategies along with predator insect defense introduction, and therefore we anticipate generating a minimal amount of air pollution or particulates that may pose any risk of harm to environment and/or any individual working at or near the cultivation site. Center Grow also do not anticipate odor complaints as the cultivation site is over 2.0 miles from the nearest residence.

## ROLES AND RESPONSIBILITIES

Jason Jones, Director of Cultivation, and President of D&M Compassion Center will be personally responsible for responding to any complaints by neighbors.

While there are no residents within 1000 ft of the cultivation site, Center Grow will supply neighboring land owners with the personal contact information for Jason Jones.

## MINIMIZING ODOR, AIR POLLUTION AND PARTICULATES

Center Grow anticipates the following sources to be the most significant emitters of odor, air pollutants and particulates. However, we do not anticipate any single source or combined sources to be harmful or detrimental to the neighboring residences or the air quality of Lake County.

Sources/Activities:

- Dust from gravel road and cultivation site;
- Emission from tractor, wood chipper, and other equipment;
- Odor from processing facility and cultivation site;

**DUST FROM GRAVEL ROAD (BMPs)** Center Grow understands that unpaved roads can be a potential source of air pollutants. This problem generally occurs during the dry season from May through October. Center Grow will mitigate particulate matter from entering the air from vehicles of visitors or employees. The property road will be well maintained and monitored regularly for quality of its surfacing. Possible mitigation measures for reducing particulate matter produced by gravel road travel includes, but is not limited to as follow:

- Hiring a water truck as needed to wet the road surface and reduce particulate generation;
- Maintaining the surface of the road; or as needed to reduce particulate matter;
- Reducing the amount of travel on gravel roads through efficient management and enforcing strict speed limits on all road on property;
- Consolidate activities like solid waste removal and supply deliveries to as few per possible per week.

DUST GENERATION FROM SITE (BMPs) Center Grow understands that there is potential for the generation of particulate matter during soil disturbance activities. The following best management practices will be employed to reduce this risk:

- Establish a full, year-round ground cover within the cultivation site to limit particulate generation during work activities;
- Limit soil disturbance activities to periods when enough moisture is present in the soil to limit particulate generation;
- The actual cultivation site will be mulched or planted into cover crop as soon as possible after any activities that disturb the surface of the soil.

EMISSION FROM TRACTOR AND OTHER EQUIPMENT (BMPs) Center Grow expects to use the following equipment, which could impact air quality, for cannabis cultivation related activities:

- 45hp Kubota Tractor
- 18hp gas wood chipper
- Gas powered brush cutter
- Gas powered lawnmower
- Gas powered chainsaw

In order to mitigate potential effects on air quality from the named farm equipment, Center Grow will ensure that this equipment used on a minimal basis and all equipment is properly maintained to ensure efficient operation.

ODOR FROM PROCESSING FACILITY (BMPs)

In rooms where cannabis is handled, dried, cured and generally

processed, the atmosphere will be scrubbed using in-line fans that have been coupled to filters that contain activated carbon. Activated carbon is the industry standard for the elimination of cannabis odor. Additional HEPA filters will be installed and used to eliminate harmful bacteria and particulates.

Center Grow will log and maintain accurate records, repairs and replacements of the ventilation and odor mitigation systems and will retain records.

## POINT SOURCE CONTROL MANAGEMENT

No materials will be used as much as such as paints, carpet, composite wood, adhesives, and sealants that have the potential for significant emissions. Construction areas if any will be isolated to prevent contaminating non-construction areas.

## ODOR COMPLAINT OR NUISANCE MANAGEMENT (BMPs)

Jason Jones will be designated as the responsible party for odor complaints. He will be trained to take the following steps in response to an odor complaint.

- Should an odor complaint be received, he will respond as soon as possible or within 12 hours of receiving the complaint to discuss the issue, recording time, date and person affected; and then will then immediately stop all activities that may cause the odor;
- If he believes that the odor drift was caused by the wind, he will stop operations for one hours until the odor dissipates or until the direction of the wind changes, at which point he will restart operations;
- If the complaint occurs for a second time in a period of 8 hours, he will halt operations for the day. In the case that

the odor is the result of the receiving or storage of compost, Center Grow will follow the following practices:

- Consider blanketing the compost with non-odiferous material;
- Expedite the receiving process

#### ADDITIONAL ODOR MITIGATION PRACTICES FOR OUTDOOR CULTIVATION

- Planting hedge rows of native flowering shrubs with coinciding flowering cycles to cannabis, if necessary;
- Development of misting system which serves to increase ambient humidity in the cultivation site and reduce offsite odor drift;

Center Grow will monitor and document the performance of the Air Quality Management Plan implemented at the premises.

On an annual basis, Center Grow will review all documentation pertaining to the performance of the Air Quality Management Plan as to determine if the risk of nuisance odors are within acceptable tolerances or ranges; or can be mitigated further by implementing new best management practices or advanced technology and mechanical systems.

#### REPORTING PERFORMANCE OF AQMP

All data and information will be made available to Lake County Community Development Staff, and the Lake County Air Quality Management District as required or upon request.

#### ONGOING REVIEW

Director of Cultivation, Jason Jones, will review all procedures in the AQMP once a year, or as needed; and he will take action to ensure full compliance with local, state, and federal regulations

that pertain to the use of fertilizers.

## CULTURAL RESOURCES PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California and as such will adopt a Cultural Resources Plan.

### PURPOSE

The Cultural Resources Plan (CRP) is intended to protect the cultural, historical, archaeological, and paleontological resources on the lot of record where the permitted activity is located.

In-line with the goals of Lake County, Center Grow's CRP includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported or available upon request.

### SCOPE

Center Grow CRP focuses on the following: Description of the procedure if cultural, historical, archaeological, or paleontological resources are found on property. All employees are required to follow the procedures outlined in this plan. Any deviations from this plan must be immediately brought to the attention of Jason Jones, Direction of Cultivation.

### IF CULTURAL RESOURCES ARE DISCOVERED (BPMs)

- All activities will be temporarily ceased;
- Contact will be made with qualified archeologist.

Center Grow does not expect any expansion to the cultivation site; however, before any expansion of current site or development of property is commenced, Jason Jones, Director of

**D&M COMPASSION CENTER, LLC - THE OFFICIAL CENTER  
GROW "CENTER GROW" (LAKE COUNTY MAJOR USE PERMIT  
APPLICATION)**

Mr. Jason Jones the Applicant is self-certified and has previously operated under Article 72 and thereby qualifies for "Early Activation." Please see attached certification and county correspondence.

**CEQA CATEROGICAL EXEMPTION**

The "Center Grow" project is exempt under CEQA. Center Grow will not be constructing any new structures, removing any endangered species or botanicals. Center Grow is only applying for a Type 3A license and a Major Use Permit with the County of Lake, whereby Center Grow will plant up to one (1) acre of cannabis. All pre-existing structures on the subject property will be utilized in their current state. All of Center Grow's operations will be outdoors and the plants will be planted in 50-gallon above the ground planters. The only new construction that will take place for this project is the required construction of a six (6) foot security fence, and the placement of water tanks and prefabricated storage buildings that will be located within the cultivation area. For these reasons, Mr. Jones respectfully requests that the Lake County Community Development Department deem this project as categorically exempt and in so doing find that Mr. Jones not be required to apply and process an initial study or seek approval for a mitigated negative declaration.

**ENERGY MANAGEMENT PLAN**

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California. Upon receiving permits from Lake County, CA, Center Grow will implement this Energy Plan.

RECEIVED

JUL 06 2018

LAKE COUNTY COMMUNITY  
DEVELOPMENT DEPT.

## PURPOSE

Center Grow has identified energy management strategies and technology that will reduce the carbon footprint generated from the cultivation of cannabis. The purpose of the Energy Management Plan (EMP), therefore, is to outline objectives and goals for Center Grow to achieve and identify key strategies and operational procedures that will reduce energy use and consumption.

Center Grow's Energy Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

## SCOPE

The Center Grow Energy Management Plan focuses on the following:

- Monitoring of energy consumption;
- Establishing a benchmark for performance and efficiency;
- Setting goals for alternative energy and reduction of energy

## OVERVIEW

The EMP applies to all operations performed at Center Grow's cultivation site and that consume energy resources. This includes the usage of all machinery used during cultivation, processing and packaging of cannabis.

The primary goal and objective for the EMP is to establish reliable baseline metrics and benchmark standards for the performance and efficiency of Center Grow's cultivation site. The Energy Management Plan will track the consumption of:



- Electricity;
- Gasoline and Diesel Fuel; All employees are required to follow the procedures outlined in this plan. Any deviations from this plan must be immediately brought to the attention of Jason Jones, Director of Cultivation.

ENERGY CALCULATION The following is energy calculation for the proposed Type 3 permit:

Appliance	Number in Use	Watts/Unit	Hrs./Day	Total Watts/day
Dehumidifier	2	600	12	14400
CFL Bulbs	60	13	5	3900
Whole Space AC	1	7125	4	28500
Refrigerator	1	77	24	1848
Computers	6	120	8	3600
Stereo	2	60	4	480
Fans	2	100	4	800
Vacuum	1	650	5	325
Wireless Router	3	7	24	504
Coffee Maker	1	1500	5	750
Phone Charger	4	5	10	200

Printer	1	45	.5	22.5
Security System	1	450	24	10800
Water Pump	2	2000	2	8000

TOTAL WATTS PER DAY	74129.5
KWh DAY	74.1295
KWh MONTH	2223.885

#### ENERGY (BMPs)

Center Grow will implement the following best management practices:

- Provide employees with guidelines for efficient practices;
- Minimize use and turn off lights and unnecessary electronics;
- Conduct annual employee energy efficiency training;
- Use energy efficiency features in all technology;
- Aim for new construction to be net zero energy;
- Non-peak use of pumps, motors, and other energy sources;
- Build shading for buildings and other facilities to reduce load;

ENERGY MANAGEMENT (BMPs) To develop and implement an effective Energy Management Plan, Center Grow will:

- Have an energy assessment conducted by local utility service providers;

- Log and maintain electricity and natural gas bills for five years;
- Log and maintain fuel consumption annually;
- Establish goals for energy conservation;
- Maintain accurate recordkeeping as to the cultivation/production;
- Make records and all data available;
- Adjust strategies as needed to meet energy conservation goals

#### ALTERNATIVE ENERGY

Center Grow will install a 10Kw solar array at its grow site by August 1, 2019. Center Grow shall operate at zero sum for energy use by Jan 1, 2019.

#### MONITORING AND BENCHMARKING PERFORMANCE OF EMP

Center Grow is committed to benchmarking and reducing energy consumption relative to the site's expansion and annual consumption goals. To set a benchmark, analysis will be performed on the following:

- Machinery required for the cultivation of and their efficiency;
- Energy saving alternatives to machinery;
- Operational procedures

#### REPORTING PERFORMANCE OF EMP

The result of energy monitoring readings shall be recorded on

standard monitoring data forms. All data and information will be reported to Lake County Community Development (CCD; and other interested licensing or regulatory agencies.

## FERTILIZER MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit Type 3A in Lake County, California, and therefore Center Grow submits this Fertilizer Management Plan.

### PURPOSE

The Fertilizer Management Plan (FMP) provides guidelines for the application of fertilizers, storage of fertilizers during the cultivation and employee training.

Center Grow Fertilizer Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

### SCOPE

The Center Grow Fertilizer Management Plan focuses the following:

- Proper application and consideration of amount applied;
- The timing of applications based on seasonal and climatic conditions and the growth stage of the cannabis crop;

standard monitoring data forms. All data and information will be reported to Lake County Community Development (CCD; and other interested licensing or regulatory agencies.

## FERTILIZER MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit Type 3A in Lake County, California, and therefore Center Grow submits this Fertilizer Management Plan.

### PURPOSE

The Fertilizer Management Plan (FMP) provides guidelines for the application of fertilizers, storage of fertilizers during the cultivation and employee training.

Center Grow Fertilizer Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

### SCOPE

The Center Grow Fertilizer Management Plan focuses the following:

- Proper application and consideration of amount applied;
- The timing of applications based on seasonal and climatic conditions and the growth stage of the cannabis crop;

## OVERVIEW

Center Grow approaches soil fertility from an organic and biological perspective. Biologically active soil optimizes plant health, reduces the need for fertilizers, increases plants abilities to fight insect infestation, and reduces irrigation rates overall. Center Grow will require good biologically active compost, and extracts made from compost as the basis for our fertility program. Compost builds healthy soil over time, increasing the infiltration rates of rainwater, and exists in a stable form that produces little runoff. Along with compost, annual soil testing gives a complete view of the mineral balance of the soil. Amendments are added in the spring to adjust mineral balance for the growing season.

To limit infiltration and water quality degradation, Center Grow will irrigate and apply fertilizer consistent with the proper agronomic rate. All application will be at rates that are reasonable for crop, soil, climate, special local situations, management system and type of fertilizer.

All fertilizers will be stored in their original package and may only be used in strict accordance with the product label requirements including, but not limited to directions pertaining to application, storage and disposal of the fertilizer product. Data safety sheets for all fertilizers will be maintained always.

## FERTILIZER APPLICATION (BMPs)

- The following are best management practices used in application:
- Plant cover crop to boost soil fertility and protect from storm events;
- Follow the manufacturer's suggested application rates;
- Contain any spills immediately;

- Prevent off-site drift with hedges or fencing;
- Do not spray directly on surface water to allow fertilizers to drift to surface water. Spray only when wind is blowing away from surface water;
- Install buffer strips, bio-swales, or vegetation downslope of cultivation site to filter runoff of chemicals from irrigation;
- Implement Integrated Pest Management practices to avoid the need for pest control;
- The use of fertilizer shall not occur within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

**FERTILIZER STORAGE (BMPs)** The following are best management practices used in storage:

- Ensure fertilizers are properly labeled and stored to avoid contamination through erosion, leakage, or inadvertent damage from rodents, pests, or wildlife;
- Establish and use a separate storage area for fertilizers;
- Ensure all such storage areas shall comply with the riparian setback requirements, be in a secured location in compliance with label instructions, be located outside of areas of known slope instability, and be protected from accidental ignition, weather, and wildlife;
- Ensure storage areas have appropriate secondary containment structures to protect water quality and prevent spillage, mixing, discharge, or seepage;
- Store any chemicals in a secure building or shed to prevent access by wildlife
- Store all products that impact water quality in a manner that does not allow for runoff to surface waters;
- Segregate acids from bases; segregate inorganic oxidizing

acids (e.g. nitric acid) from organic acids (e.g. acetic acid), flammables, and combustibles;

- Segregate acids from water reactive metals such as sodium, potassium, and magnesium;
- Store corrosives on lower shelves at least below eye level and in compatible secondary containers, and will not store corrosives on metal shelves;
- Store dry powder and granular fertilizers in moisture-proof plastic tubs or containers

Center Grow will maintain an accurate log of all fertilizers to be used for the cultivation of cannabis. The log will detail the date, fertilizer type, amounts applied, method, the operator applying, and any additional inputs or amendments to the soil.

#### EVALUATING PERFORMANCE OF FMP

We will evaluate the yields for each batch and harvest of cannabis cultivated against the fertilizer inputs, benchmarks will include:

- Overall dry flower yield per strain, per square foot of canopy;
- Potency for each batch of crop of cannabis cultivated;
- The quantity of amendments or additional inputs used during cultivation;
- Environmental conditions during the flowering phase of plant development;

#### EMPLOYEE TRAINING

Center Grow will ensure all employees and managers are trained to adhere to the following best management practices at the



cultivation facility. Each employee will be trained on the following:

- Acute, chronic, and delayed effects of fertilizers;
- Routes by which fertilizers can be absorbed by the body;
- Emergency first aid for fertilizer overexposure;
- How to access emergency medical care;
- Decontamination procedures;
- Spill clean up;
- Importance of showering with soap and warm water;
- Compliant use of fertilizers;
- How to use Personal Protective Equipment;
- Heat illness prevention, recognition, and first aid;
- Safety requirements and procedures for handling, storing, transporting and disposing;
- Warning against taking fertilizers and/or fertilizer containers home;
- Triple Rinsing;
- Proper disposal practices;
- All necessary personal protective equipment will be available, clean, and properly stored;
- Fertilizer application equipment shall be properly calibrated;
- Fertilizer wastes shall not be disposed of on the ground, into or near water, or into storm drains, or septic tanks;
- Fertilizer containers, including empties, will not be left unattended, handled, emptied, stored or disposed of in a way that would create a hazard for people animals including bees, food, feed, crops or property.

FERTILIZERS TO BE USED: Center Grow will be Organic Certified.

REVIEW Director of Cultivation, Jason Jones, will review all

procedures in the Fertilizer Management Plan once a year and will take action to ensure full compliance with local, state, and federal regulations that pertain to the usage of fertilizers.

## FISH AND WILDLIFE MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California, and therefore implements the following Fish and Wildlife Management Plan.

### PURPOSE

The Fish and Wildlife Plan has been designed to minimize any adverse impact on fish and wildlife and to ensure that the cultivation site and operations performed on site by Center Grow is in no way destructive to the local habitat.

### SCOPE

The Center Grow Fish and Wildlife Management (FWMP) plan focuses on:

- A description of fish and wildlife that live on, or seasonally inhabit the lot of record;
- A description of the habitats found on the lot of record;
- Description of the watershed found on the lot of record;
- Methods to minimize adverse impact on the fish and wildlife. All employees are required to follow the procedures outlined in this plan.

### OVERVIEW

In June 2018, Center Grow conducted a biological survey performed with the assistance of the North Coast Resource

procedures in the Fertilizer Management Plan once a year and will take action to ensure full compliance with local, state, and federal regulations that pertain to the usage of fertilizers.

## FISH AND WILDLIFE MANAGEMENT PLAN

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- A description of the habitats found on the lot of record;
- Description of the watershed found on the lot of record;
- Methods to minimize adverse impact on the fish and wildlife. All employees are required to follow the procedures outlined in this plan.

### OVERVIEW

In June 2018, Center Grow conducted a biological survey performed with the assistance of the North Coast Resource

Management (NCRM) agency. This survey was conducted with the intent of identifying key stresses and pressures being directly applied to conservation targets because of the cultivation of cannabis at the premises. The results identified no adverse effects on fish and wildlife or habitat regarding current site or proposed site expansion. "We find that the proposed project will not have a substantial adverse effect, either directly or through habitat modifications, on any special-status wildlife, plant, or plant communities identified as a candidate, sensitive, or in local or regional plans, policies, or regulations, or by CDFW or the USFWS."

#### HABITATS ON LOT OF RECORD

The lot of record includes three prevailing habitat types: (1) Woodland/Madron Forest; (2) Chaparral; (3) Mixed Riparian Forest

#### HABITAT DESCRIPTION FOR SUBJECT REAL PROPERTY

##### Chaparral

Structure-- The growth form of montane chaparral species can vary from treelike (up to 3 meters) to prostrate. When mature, it is often impenetrable to large mammals. Its structure is affected by site quality, history of disturbance (e.g., fire, erosion, logging) and the influence of browsing animals. Montane chaparral is characterized by evergreen species; however, deciduous or partially deciduous species may also be present. Understory vegetation in the mature chaparral is largely absent. Conifer and oak trees may occur in sparse stands or as scattered individuals within the chaparral type.

Composition-- Montane chaparral varies markedly throughout California. Species composition changes with elevational and

geographical range, soil type, and aspect. One or more of the following species usually characterize montane chaparral communities: whitethorn ceanothus, snowbrush ceanothus, greenleaf manzanita, pinemat manzanita, hoary manzanita, bitter cherry, huckleberry oak, sierra chinquapin, juneberry, fremont silktassel, Greene goldenweed, mountain mahogany, toyon, sumac and California buckthorn. As one or more of these species become dominant under various environmental regimes, further sub classification of the montane chaparral series is possible (Krebs 1972, McNaughton 1968).

Wildlife Considerations-- Montane chaparral provides habitat for a wide variety of wildlife. Numerous rodents inhabit chaparral (Wirtz 1974). Deer and other herbivores often make extensive use of chaparral.

#### Mixed Riparian Forest:

In mixed riparian forests, very tall oaks are less common, and the frequency of sapling oaks is higher.

A mid story canopy of medium sized trees and tall shrubs such as sycamores and box layer is present in mixed riparian forests, composed contains a greater proportion of smaller shrubs than is present in Valley oak elder. The understory woodlands. Mixed riparian forests may be dominated by tall (>30m) cottonwoods and medium sized arroyo willows (*Salix lasiolepis*) and black willows (*Salix gooddingii*).

#### WATERSHED DESCRIPTION

The dominant West/East ridge and drainage located on the property results in one watershed. The cultivation site is greater than 100 feet from the small pond/lake fully contained within the property; and a spring at the base of this small pond/lake

a spring at the base of this small pond/lake provides the water.

## IMPACT MITIGATION STRATEGIES

Center Grow will use the following strategies to maintain our current standing and minimize any future impact on fish and wildlife:

- Be aware of wildlife mating, nesting and migration patterns on property and schedule any construction projects accordingly;
- Survey the areas of impact no more than three days prior to impact or removal;
- Site related work should occur between August 15<sup>th</sup> and February 15<sup>th</sup> ;
- If work is to be conducted within the breeding season for nesting, a nesting bird survey should take place at least once before any vegetation disturbance or removal take place;
- Protect any active nests with a 50 to 100-foot buffer (species dependent) or exclusion area until the nest is no longer active;
- Perform fueling and maintenance of vehicles and equipment where absorbent spills and clean-up materials as well as spill kits are available, and such materials should be disposed of properly after use;
- Center Grow shall not disturb aquatic or riparian habitats, such as pools, spawning sites, large wood, or shading vegetation, unless authorized under a CWA section 404 permit, CWA section 401 certification,

Regional Water Board WDRs (when applicable), or a CDFW LSA Agreement :

- Center Grow shall maintain existing, naturally occurring, riparian vegetative cover (e.g., trees, shrubs, and grasses) in aquatic habitat areas to the maximum extent possible to maintain riparian areas for stream bank stabilization, erosion control, stream shading and temperature control, sediment and chemical filtration, aquatic life support, wildlife support, and to minimize waste discharge

**EVALUATING PERFORMANCE OF FWMP** To evaluate the effectiveness of the FWMP, Center Grow will monitor and log water quality monthly, and perform a biological assessment of the property every two years or in the case of site expansion. Biological assessment reports and water quality logs will determine if conservation strategies are successful or if changes needed to be applied. Professional services will be rendered for biological assessments if necessary.

#### **REPORTING PERFORMANCE OF FWMP**

All data collected by Center Grow for the purposes of conservation will be shared and reported to Lake County officials, as well as to the appropriate agency if requested:

- California Department of Fish and Wildlife
- California State Water Resources Control Board
- California Division of Water Rights;

Jason Jones will review all procedures in the Fish and Wildlife Plan once a year. In particular, to ensure full compliance with local, state and federal regulations that

pertain to the conservation of the habitat and the species of wildlife it sustains. Center Grow has received the following certification(s):

- Enrolled in Tier 2 of the Central Valley Regional Water Quality Control Boards Cannabis Waste Water Discharge Program;

Conservational targets, strategies and goals are with those that have been determined by the following conservational acts and programs, but not limited to as follows:

- California Endangered Species Act
- California Environmental Quality Act
- Clean Water Act
- CDFA's CalCannabis Cultivation Licensing Program
- State Water Board's Cannabis General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (Cannabis General Order) or any Waste Discharge Requirements addressing cannabis cultivation activities adopted by a Regional Water Quality Control Board (Regional Water Board)
- State Water Board's General Water Quality Certification for Cannabis Cultivation Activities (Cannabis General Water Quality Certification)
- State Water Board's Cannabis Small Irrigation Use Registration (Cannabis SIUR)
- State Water Board's Water Rights Permitting and Licensing Program. The following agencies and policies were consulted in preparation of this Biological Assessment.
- California Department of Fish and Wildlife (CDFW)
- California Department of Forestry and Fire Protection (CALFIRE)



be added to avoid storm water discharge.

The gradual slope of the proposed cultivation site makes it unlikely that the site will require specialized drainage features. Vegetated ground cover will be established over the entire site as soon as possible, and the site will be surrounded on all sides by a densely vegetated buffer strip capable of absorbing any sheet flow or runoff from the site. If the site exhibits poor drainage, techniques mentioned above will be developed. If the site requires a wastewater treatment facility, the facility will be designed, constructed, and maintained to ensure sanitary working conditions, eliminate the possibility of contamination, and protect working and consumer safety.

#### EVALUATING PERFORMANCE AND REPORTING OF THE OPERATIONS MANUAL REVIEW

Center Grow Director of Cultivation, Noah Cornell, will perform a weekly inspection of the cultivation site to ensure the guidelines of the Operations Manual are being carried out successfully, and the notes shall be logged in the Operations Manual, which is to be kept on site. Any poorly performing elements of the system or improper employee conduct will be corrected. If construction of drainage features or construction is required, all necessary permits and approvals will be acquired from the appropriate agency.

#### PEST MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permits (Type 3A) in Lake County, California. Center Grow will implement the following Pest Management Plan.

#### PURPOSE

The Pest Management Plan (PMP) is designed to ensure that in the use of pesticides, they are used only after monitoring

indicates they are needed and used with the goal of removing only the target organism, safely.

Center Grow Pest Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

## SCOPE

The Center Grow Pest Management Plan focuses on the following:

- Pest prevention, deterrence and organic techniques;
- Employee training and safety;
- Storage of pesticides;
- Monitoring the effectiveness of the plan as well as reporting data to Lake County officials and the appropriate local agencies. All employees are required to follow the procedures outlined in this plan.

## OVERVIEW

Center Grow will be a pesticide-free farm. We use an integrated ecosystem focused strategy that focuses on long-term prevention of pests and damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties.

Instead of utilizing chemical pesticides, Center Grow will implement proactive systems using beneficial insects to target specifically selected species as well as daily pest scouting to ensure production of the cleanest, purest, high-quality cannabis.

## PEST DETERENCE (BMPs)

Center Grow practices the following techniques to minimize pest

infestations:

- Minimizing dust
  - Releasing predatory mites
  - Hanging yellow sticky cards.
  - Removing any infested plant material
  - The use of companion plants and other trap crops
  - Using reflective mulches If necessary, Aster Farms will use organic pesticides including but not limited to:
    - Neem oil
    - Horticultural oil
    - Sulfur
  - Insecticidal soaps
- PESTICIDE USAGE (BMPs) In the case, all preferred methods of pesticide prevention and eradication have proven unsuccessful, the following are best management practices for pesticide use at Aster Farms:
- Follow all labels and directions before, during and after the use of pesticides;
  - Do not over apply pesticides;
  - Pesticides are prepared and loaded on an impermeable pad at least 100 feet away from surface water bodies;
  - Do not apply pesticides when pollinators are present;
  - Do not spray directly into surface water and only spray when wind is blowing away from surface water bodies;
  - When possible, use naturally insecticidal plants around or throughout a grow to repel a variety of flying insects and pests;
  - The use of pesticides shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool - for purposes of determining the edge of Clear Lake, the setback shall be measured from the full lake level of 7.79 feet on the

## Rumsey Gauge

If there is a spill or accidental discharge in or on any waters of the site, immediately notify the Office of Emergency Services so that the local health officer can decide what actions, if any, may need to be taken to protect public safety - HAZMAT SPILL NOTIFICATIONS 1 (800) 852-7550 or (916) 845-8911

## WORKER PROTECTION (BMPs)

In the case of pesticide use, Center Grow shall follow the EPA's Agricultural Workers Protection Standard by:

- Providing protections to workers and handlers from potential pesticide exposure;
- Providing training on the safe use of pesticides;
- Providing training on how to avoid exposures to pesticides;
- Training to identify pesticides exposure symptoms and how to respond and manage exposures to pesticides if they occur

## STORM WATER MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type A) in Lake County, California, and accordingly is implementing the following Storm Water Management Plan.

### PURPOSE

The purpose of the Storm Water Management Plan is to protect the water quality of the Clear Lake watershed and the storm water management systems managed by Lake County Department of Water Resources.

Center Grow Annual will report to either the Central Valley Regional Water Quality Control Board or the California State Water Resources Control Board as required, and reporting forms will be made available to the Lake County Community Development Department (CDD).

Storm water Management plan and notes will be kept on areas needing improvement. Any failing elements within the system that could result in the illicit discharge of storm water will be addressed immediately. Ongoing storm water reporting logs will be made available to the County and/or other regulatory agencies.

#### REVIEW

Center Grow will review the Storm Water Management Plan on an annual basis, in conjunction with the review of the Water Uses Management Plan.

#### WASTE MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California. Accordingly, Center Grow will implement the following Waste Management Plan.

#### PURPOSE

The Waste Management Plan (WMP) provides guidelines to minimize the generation of waste and for the proper disposal of waste produced during the cultivation and processing of cannabis at Center Grow. The primary objective is to prevent the release of hazardous waste into the environment, minimize the generation of cannabis vegetative waste and dispose of cannabis vegetative waste properly, and manage growing medium and dispose of growing medium properly.

Center Grow's WMP includes measures to monitor and evaluate

the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local agencies.

## SOLID WASTE

### OVER VIEW

Center Grow's Solid Waste Management Plan (SWMP) is implemented from seed to storage to sale. In each stage of the business cycle Center Grow will carefully consider the lifecycle and environmental impact of all materials brought on property and used in cultivation and packaging. Reusable, compostable or recycled materials are preferred and Center Grow will seek to continuously improve efficiencies and reduce volume each year in business.

### SCOPE

The Center Grow Solid Waste Management Plan focuses on the following: The reduction of solid waste in accordance with the the County of Lake and the State of California's conservational goals, in particular bearing in mind the demand that has been placed on the County's local landfill due to the event of recent catastrophic wild fires and residential and commercial structure losses.

The operations of a sustainable solid waste management system to ensure the protection of the environment, streams, riverbeds, wetlands and all habitats surrounding the cultivation premises. Mitigating the amount of solid waste diverted to a landfill. Properly monitoring, evaluating of effectiveness of the plan, and reporting of data to Lake County and the appropriate local agencies

All employees are required to follow the procedures outlined in this plan.

### SOURCES OF SOLID WASTE

We have identified the following items as sources of potential solid waste generated at our facility:

Paper and Cardboard: 2lbs Daily High Season 100lbs Annually Paper/Cardboard will be composted on site

Glass: 1lbs Daily High Season 500lbs Annually Glass will be recycled at Lake County Waste Transfer Station, 230 Soda Bay Road, Lakeport CA

Metal: 2lbs Daily High Season 250lbs Annually Metal will be recycled at Lake County Waste Transfer Station, 230 Soda Bay Road, Lakeport CA

Plastics: 5lbs Daily High Season 1000lbs Annually Plastics will be recycled at the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA.

Organic: 10lbs Daily High Season 500lbs Annually Organic will be composted on site.

Inert: 0lbs Daily High Season 500lbs Annually Inert will be taken to the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA.

Household Hazardous Waste 0.5lbs Daily High Season 100lbs Annually Household Hazardous Waste will be taken to Lake County Waste Transfer Station, the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA.

Special Waste: 0lbs Daily High Season 25lbs Annually Special Waste will be taken to the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA.

Mixed Residues: 0.5lbs Daily High Season 50lbs Annually

Mixed residues will be taken to the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA.

## SOLID WASTE REDUCTION PLAN

Center Grow intends to decrease waste by 25% over the first three years of operations and will continue to make efforts to reduce waste a priority. Total volumes are recorded and logged each month as benchmarks for next year's goals.

### SOLID WASTE REDUCTION PLAN (BMPs)

Center Grow will: Achieve annual rate of waste diversion with a target goal of 90%. Assign and train staff on waste reduction and discuss waste and recycling strategies once per quarter and at the beginning of each phase of the cultivation process with subcontractors and vendors with the goal of reducing solid waste generation. Designate multiple spaces on the property to collect recyclable materials and sort materials into biodegradable, recyclable and non-recyclable receptacles. Reuse and recycle materials to divert waste from landfill; and promote conscientious purchasing with the following:

- Consider lifespan of the purchase, utilize warranties and servicing options
- Consider purchases with replaceable parts so they are easy to repair
- Look for products that can easily be reused or recycled or are made from recycled materials
- Check that the products do not contain toxic materials
- Consider products with minimal packaging

Center Grow will purchase farm inputs and materials in bulk using reusable totes and containers and looks for companies that use



reusable, compostable; or recyclable packaging while working with logistics vendors to maximize transportation and logistics efficiencies

Work with packaging vendors who share our waste reduction goals and offer recyclable materials; Design packaging with eco-friendly, reusable and/or recyclable materials; and budget financial resources to waste reduction

Evaluate waste reduction programs with professionals, annually, and modify as needed to achieve our goal. Manage, track and analyze information for actionable insights and cost savings

## SOLID WASTE COLLECTION

Center Grow will maintain separate trash enclosures and storage areas for organics, recyclable waste and non-recyclable waste in compliance with Lake County Ordinances. All compostable waste will be composted on site. All non-compostable solid waste will be hauled to a solid waste facility, obtaining record from solid waste facility showing the acceptance of all solid waste, address of facility, the date, the volume or weight.

For onsite collection of waste, Center Grow will place portable waste bins designated for green waste, recyclables and non-recyclables in the most convenient and highly trafficked areas for easy disposal. At the end of each day, all solid waste will be brought to the respective solid waste collection area and stored in a secured bin to prevent wildlife from entering.

Two to four times per month, designated employees will gather all non-compostable solid waste and haul to the Clearlake Landfill and Quakenbush Facilities in Clearlake, CA., using a company truck. Recycling waste will be placed into reusable bins for transport. Non-recyclable waste will be placed in bags. All solid

waste will be secured under tarps in transit.

## MONITORING AND DOCUMENTING THE GENERATION AND REDUCTION OF SOLID WASTE

Center Grow will track and calculate, in tons, total waste leaving the property and waste diversion rate monthly. Jason Jones, Director of Cultivation is responsible for recording total weight of recyclable and non-recyclable solid waste removed from the property and records are kept for inspection and review in a locked office.

We will benchmark annual ratio of retail-ready flower products to solid waste generated.

## DATA REPORTING

Center Grow will share all data pertaining to the cost of implementation, success/failure rates of the solid waste plan and any effort taken to mitigate the generation of solid waste to Lake County on a quarterly basis or as requested.

## REVIEW

Jason Jones, Director of Cultivation, will review all procedures in the Solid Waste Management Plan once a year and will take action to ensure full compliance with local, state and federal regulations that pertain to solid waste management.

## HAZARDOUS WASTE MANAGEMENT PLAN

### OVERVIEW

Center Grow's Hazardous Waste Management Plan (HWMP) is designed to identify and evaluate hazards associated with cannabis cultivation at Center Grow. This includes analysis of cultivation, processing, storing and packaging as well as all other activities associated with the production of cannabis on site. The

goal of the plan is to determine whether there are existing hazards which require preventative control. Hazards include biological, chemical or physical.

We do not intend to use or produce any hazardous waste on site.

#### SCOPE

The Center Grow Hazardous Waste Management Plan focuses on the following: The identification of any and all hazards associated with cannabis cultivation, processing and packaging on site. The management, storage and recordkeeping of hazardous materials. Proper clean up and disposal and emergency spill response procedures.

All employees are required to follow the procedures outlined in this plan. Any deviations from this plan must be immediately brought to the attention of Jason Jones, Director of Cultivation at Center Grow.

#### HAZARD ANALYSIS

The analysis includes the following: Biological hazards, including microbiological hazards; chemical hazards, including radiological hazards, pesticide(s) contamination, solvent or other residue, natural toxins, decomposition, unapproved additives, or food allergens. Physical hazards, such as stone, glass, metal fragments, hair or insects.

In the case the preventative controls are recommended, Center Grow will implement those measures before each season.

#### IDENTIFICATION OF POTENTIAL HAZARDS

##### Biological Hazards:

Cultivation activities may require the use biologically active fertilizers. Application of these products will follow all rules for safe

pesticide and fertilizer storage and application. All Center Grow employees will be trained in the safe handling of potential biological hazards.

#### Chemical Hazards:

While Center Grow utilizes organic farming, and prioritizes the use of non-hazardous products and materials, there may be a potential for chemical hazards with the use of cleaning products, fuels, and various construction materials. Should Center Grow employees use these products, all will be trained in safe handling and application procedures. All potentially hazardous materials will be stored in a manner to minimize the risk of spillage and contamination, in a secure and clearly marked area.

#### Physical Hazards:

An analysis of the cultivation site produced no evidence of physical hazards. To limit potential future risk, the site will be kept free of rubbish and debris, and employees will wear appropriate protective clothing while working on site.

#### Evaluation:

The most effective strategy to reduce the potential for illness and injury from hazardous wastes is to reduce their use and presence onsite. In the case that hazardous material is stored and used, the following best management practices are followed to reduce risk:

All hazardous materials will be clearly labeled as hazardous and stored in a manner which reduces the risk of spillage and contamination. All employees will be trained in the safe handling and storage protocols for hazardous materials.

All employees will be briefed on the emergency response plan for possible spillage of, or exposure, to hazardous waste, and the location of emergency contacts and response procedures. All

hazardous waste will be disposed of properly

In regard to the end product and the cannabis consumer, we will evaluate the following:

- The sanitation conditions of the processing site;
- The operation's transportation and transfer practices;
- Processing procedures;
- Packaging and labelling activities;
- The storage of packaging and/or the finished cannabis;
- Any other relevant factors product

Center Grow intends to only produce pure cannabis flower products for the medical and adult use (commercial) consumer market. No additional ingredients or additives will be used in the processing or packaging process. Licensed distribution companies involved in the transport of Center Grow products will be assessed for the safe and sanitary conditions of their company vehicles used for transport. Products, at the time of transfer and transport will be placed in compliant packaging, and completely sealed from the outside environment in airtight containers.

Center Grow's storage, processing, and packing facility will follow the guidelines set for the in the USDA's Sanitation Performance Standards Compliance Guide, in order to ensure the highest standards for employee and consumer safety.

#### MANAGEMENT OF HAZARDOUS WASTE

Currently there are no RCRA or Non-RCRA hazardous waste located on the premises. Clear plastic totes will be used for the storage of potentially hazardous waste and clearly labeled to display the volume and type of material stored. Containers will be stored in a locked storage area and will only be accessible to authorized staff.

The type of material, date, and time will be entered into a hazardous waste manifest located within the secure storage area and will be stored for five years. When returning material into storage, the type of material, volume used, name of employee, date and time will be entered into the manifest. Storage areas containing hazardous waste will be inspected weekly by Center Grow staff to ensure accurate record keeping and safe storage conditions.

#### EMERGENCY PROTOCOL – FOR SPILL OR CLEAN UP

In the case of a spill, the employee shall: Perform an initial risk assessment from a safe distance, first considering the type of material spilled, volume of spill, potential for fire or airborne vapor; and then immediately make contact with Jason Jones and give an initial risk assessment. In the risk of fire, call 911 or the Lower Lake Fire Department, and locate the nearest posted fire extinguisher. If no immediate fire risk is present, employee shall change into appropriate safety gear/equipment and clean up spill immediately. After spill has been cleaned, place material in a secure storage bin to be taken to a hazardous waste recovery facility along with all clothing worn during clean up. If an immediate risk is perceived, all staff will evacuate the premises, contact the appropriate response authorities, and log as the nature of the spill for reporting to emergency response authorities.

#### EMPLOYEE TRAINING

All Center Grow staff will be responsible for the safe handling, storage, and disposal of hazardous materials. An introductory training on company procedures will be conducted before any employees can begin working. Training will include:

- Procedures for the safe disposal of hazardous materials.
- Storage locations containing hazardous materials and the

labeling system for materials. How to appropriately log and track the movement and use of hazardous materials onsite; and required safety gear and appropriate clothing to wear while handling hazardous materials;

- Use of hazard grade Personal Protection Equipment according to the specific requirements of the hazardous material including: rubber gloves, rubber boots, glasses or eye protectant, ear protectant, apron or skin protector, air filter face mask, chemical spill UL grade filter, proper wash and storage are of PPE materials;
- Chemical bins and storage will be separate from all other material and handled accordingly;
- Emergency spill response procedure, the location of emergency response contact information, locations first aid stations and the location of fire extinguishers on the premises

## RECORD KEEPING AND STORAGE

Center Grow does not intend to utilize or generate hazardous waste as part of the cannabis cultivation program. However, data will be logged into the hazardous waste manifest located in storage where hazardous materials are stored, in the case of use or incidental generation.

The storage room shall be maintained with the materials safety data sheets (MSDS) appropriate to the contents of the room. All employees shall be trained for competency on how to read and understand these documents:

- Name of chemical;
- Manufacturer's information;
- Hazardous ingredients/identity information;
- Physical/chemical characteristics;
- Fire and explosion hazard data;
- Reactivity data;

- Health hazard data;
- Precautions for safe handling and use
- Control measures: Duplicate copies of the MSDS shall be maintained in a separate location on-site, along with records of the locations of volatile or restricted substances.

## CANNABIS VEGETATIVE MATERIAL WASTE MANAGEMENT PLAN OVER VIEW

Center Grow's Cannabis Vegetative Material Waste Management Plan (CVMWMP) provides compliant guidelines for on-site composting and removal of all cannabis waste, organics and green waste.

Center Grow's CVMWMP includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to Lake County and the proper local and/or state agencies.

## SCOPE

The Center Grow Cannabis Vegetative Material Waste Management Plan focuses on the following:

The recording and benchmarking of the amount of cannabis vegetative waste generated on site on an annual basis. The reduction of cannabis vegetative waste generation; and the processing, storage and disposal of cannabis vegetative waste

All employees are required to follow the procedures outlined in this plan.

## ESTIMATES FOR CANNABIS VEGETATIVE WASTE



We estimate that the Type 3 UP cannabis crop will produce 250 lbs of cannabis vegetative waste which will consist of stems, branches, trunks, roots and other organic materials from the plant rendered useless in the harvesting process.

#### CANNABIS VEGETATIVE WASTE REDUCTION PLAN

Center Grow's reduction plan hinges on healthy plants and the composting of all clean unusable cannabis vegetative waste on site.

#### PROCESSING, STORAGE AND DISPOSAL (BMPs)

All green waste is composted onsite and reused on site. All green waste is held in designated holding area for 72-hour period with affixed batch information and weight before beginning the composting process to render unusable, cannabis vegetative waste will be shredded and made unrecognizable and added to a ground mixture of at least 50% non-cannabis material, tracking each batch from disposal to compost through track and trace once the system is live at the State level.

Green waste that is unable to be composted for any reason will be disposed of in a secure receptacle and brought to a solid waste facility, obtaining record from solid waste facility showing the acceptance of the green waste material, address of facility, the date, the volume or weight of cannabis accepted.

Detailed records of cannabis vegetative waste will be logged and benchmarked for the Clearlake Landfill and/or Quakenbush Facilities.

#### STORAGE

The facility will feature a secure cannabis waste area for cannabis plants that have been marked for disposal. At the close of each day, cannabis plant waste from the property will be removed and

placed in the secured cannabis waste area and held for a minimum of 72 hours. The secure waste area will remain locked and only authorized personnel will have access. At the end of each week, all cannabis products that have been marked for disposal shall be rendered unusable by grinding and incorporating them with other ground organic materials (e.g., food, coffee grounds, shredded paper), yielding a mixture that is at minimum 51 percent non-cannabis waste by volume. The mixture will then be transferred to the composting site. Once a month, on a regular basis, the compost will be turned to encourage proper rates of decomposition.

#### MONITORING AND DOCUMENTING

Center Grow is committed to monitoring and documenting the amount of cannabis vegetative waste that is generated by the facility on a monthly basis. These processes will include:

Weighing and logging the total amount of organics and cannabis waste generated. Weighing and documenting the total amount of retail-ready cannabis flower products against cannabis vegetative waste generated.

#### DATA REPORTING

Center Grow will share with the County of Lake, Department of Public Services on a quarterly basis or as requested, all data pertaining to the cost of implementation and success/failure rates of the reduction plan, and any effort taken to mitigate the generation of organic waste.

#### COMPLIANCE

Center Grow's Cannabis Vegetative Material Waste Management Plan has been developed in compliance with the appropriate local, county and state laws that pertain to the composting and recycling of organic and green waste produced by our cultivation

process, including:

Cannabis, Non DAA qualified, AB 2490; State Reduction Goals, AB 341 (organics out of landfills goal); State Reduction Goals, California 70-percent reduction plan; Cannabis Cultivation Policy, California State Water Resources Board; California Code of Regulations, Title 3 Food and Agriculture, Division 8 Medical Cannabis Cultivation, Section 8108 Cannabis Waste Management.

## REVIEW

Director of cultivation, Jason Jones, will review all procedures in the Cannabis Vegetative Waste Management Plan once a year and will take action to ensure full compliance with local, state and federal regulations that pertain to the usage of organic soils, mediums, amendments, and inputs.

All employees are required to follow the procedures outlined in this plan. Any deviations from this plan must be immediately brought to the attention of Noah Cornell, Director of Cultivation of Aster Farms.

## ESTIMATED MEDIUM USAGE

Projected 2018 Growing Medium: 5 Yards Projected 2019 Growing Medium: 5 Yards Projected 2020 Growing Medium: 5 Yards.

Type of Growing Medium: Compost-based organic potting soil. Our soils are mixed with compost at a 2:1 ratio respectively and mixed into the natural beds. We prefer to grow in planters as it reduces waste and the need to replenish soils annually. This technique drastically reduces our growing medium waste. Unless the soil is compromised, the soil will never be removed from the property or disposed of.

## WASTE REDUCTION (BMPs)

The following are best management practices used to reduce growing medium waste and disposal:

Plant cover crop to boost soil fertility and protect from storm events. Implement Integrated Pest Management practices to avoid the need for pest control, contamination and new grow medium. No agrochemicals, Genetic Modified Organisms (GMO), or synthetic additives will be used during the cultivation of cannabis.

## CULTIVATION (BMPs)

Center Grow only uses organic inputs to amend soils, combat pests and grow healthy plants. We focus on the following:

The restriction of inputs and amendments added to soils to be used to cultivate cannabis that do not bear organic certification. The rejuvenation of soil and soil organic matter.

## PESTS (BMPs)

We also reduce growing medium waste through pest control, applying an integrated ecosystem-based strategy that focuses on long-term prevention of pests through a combination of techniques such including:

Biological control habitat manipulation modification of cultural practice uses of resistant varieties.

## MONITORING PERFORMANCE OF GMP AND WASTE GENERATION

In monitoring Growing Medium waste, Center Grow will measure waste in tons. As referenced above, we reuse and recycle all growing medium that is brought onto our site. The only time we remove growing medium is if the soils are compromised. We will

measure growing medium waste in tons when deposited at the Clearlake Landfill or Quakenbush facilities.

## SOIL REMOVAL GUIDELINES

In the case that soil is compromised and needs to be removed from the property, the following guidelines are followed:

Excavated soil will be loaded directly onto trucks for off-hauling to the appropriate waste disposal facility. After the soil is loaded into the transport truck, the soil will be covered with secured tarps according to all applicable CA. Department of Transportation regulations to prevent soil from spilling during transport to the disposal facility.

If excavated impacted soil is stockpiled on-site prior to off-hauling, it will be placed on a paved surface and covered with plastic tarp and held down by weights. Stockpiled soil, if any, will be covered with plastic sheeting, or other similar material, at the end of each workday. A stockpile that is not being actively worked on for more than 60 minutes will be covered with plastic sheeting to prevent dust from leaving the site.

## REPORTING TO LAKE COUNTY

All testing result will be recorded in logs managed by our Director of Cultivation, Jason Jones. Data collected during the cultivation of cannabis will be shared and reported to County of Lake, and the following agencies upon request:

The CA. Department of Food and Agriculture; and the Department of Health.

## REVIEW

Director of Cultivation. Jason Jones, will review all procedures in the Growing Medium Management Plan once a year and will take action to ensure full compliance with local, state and federal

regulations that pertain to the usage of organic soils, mediums, amendments, and inputs.

## WATER RESOURCES MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type A) in Lake County, California. Upon receiving this permit, Center Grow will implement the following Water Resources Management Plan.

### PURPOSE

Center Grow's Water Resources Management Plan (WRMP) has been designed to minimize adverse impacts on surface and groundwater resources and to ensure that on site water resources and management is in full compliance with applicable local, county and state regulations.

The WRMP, in conjunction with the Water Use Plan, identifies best management practices and evaluates these strategies to reduce water demand, increase water supply, reduce potential sediment delivery to waterways, improve water quality, and enhance environmental and resource stewardship.

Center Grow's Water Resources Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to County of Lake and the proper local agencies.

### SCOPE

The Center Grow's WRMP focuses on:

- Identifying property water resources and provide description of watershed on lot of record;
- Best management practices to limit adverse impacts to water resources;

regulations that pertain to the usage of organic soils, mediums, amendments, and inputs.

## WATER RESOURCES MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type A) in Lake County, California. Upon receiving this permit, Center Grow will implement the following Water Resources Management Plan.

### PURPOSE

Center Grow's Water Resources Management Plan (WRMP) has been designed to minimize adverse impacts on surface and groundwater resources and to ensure that on site water resources and management is in full compliance with applicable local, county and state regulations.

The WRMP, in conjunction with the Water Use Plan, identifies best management practices and evaluates these strategies to reduce water demand, increase water supply, reduce potential sediment delivery to waterways, improve water quality, and enhance environmental and resource stewardship.

Center Grow's Water Resources Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to County of Lake and the proper local agencies.

### SCOPE

The Center Grow's WRMP focuses on:

- Identifying property water resources and provide description of watershed on lot of record;
- Best management practices to limit adverse impacts to water resources;

- Monitoring and reporting methodology of water resources;

All employees are required to follow the procedures outlined in this plan. Any deviations from this plan must be immediately brought to the attention of Jason Jones, Director of Cultivation.

## OVERVIEW

The applicant is drawing water from an unnamed spring with runs through the property, connected to a small lake or pond on the subject property where both the lake/pond and drainage are fully contained within the property.

The box is sealed to the outside environment and inlets are screened to prevent macro invertebrates from entering the box.

From the collection box, water is delivered approximately 100 feet uphill to a water tank collection system. When tanks are full a mechanical float switch diverts water back to the source.

Water is then pumped to four separate tanks, stored directly outside of the cultivation premise but within the cultivation site area. Water is delivered to irrigation system via a 1hp jet pump pressure tank system.

Currently, there are no wells or groundwater extraction activities on the parcel, therefore groundwater resources are unknown and will not be utilized.

## WATERSHED DESCRIPTION

## EFFORTS TO MINIMIZE ADVERSE IMPACTS ON WATER RESOURCES

## WATER CONSERVATION (BMPs)

Center Grow will draw our best management practices from Central Valley Regional Water Quality Control Board BMP for



Cannabis Cultivation. All employees and managers will practice the following:

- Do not obstruct, alter, dam or divert all or a portion of a natural watercourse without notification and approval from CDFW under the Lake and Streambed Alteration Program;
- Regularly inspect the entire water delivery system for leaks and repair leaky faucets and connectors;
- Line water conveyance ditches/canals to reduce waste and the unreasonable use of water;
- Use rainwater catchment systems to collect and store storm water during the rainy season in tanks, bladders, or engineered ponds to reduce the need for water diversions and/or pumping of groundwater during low flow periods (late summer to fall);
- Install float valves on all water storage systems to keep them from overflowing onto the ground;
- Hand water or use drip/trickle Irrigation systems, and limit watering;
- Use mulch to conserve soil moisture in cultivated areas, pots and bins;
- Water pump intakes should be screened to prevent the entrainment of threatened or endangered aquatic species - consult Fish and Game Code sections 6020-6028;
- Base layout and site development on a qualified expert's recommendations with respect to any listed species protected under California or federal law - avoid any action that constitutes a "taking" under the Federal

Endangered Species Act or California Endangered Species Act, unless accompanied by an Incidental Take Statement or Incidental Take Permit issued by the appropriate agency

EROSION, SEDIMENT, ROADS AND STORMWATER(BMPs) We draw our best management practices for erosion, sediment, roads and storm water from Central Valley Regional Water Quality Control Board BMP for Cannabis Cultivation. All employees and managers will practice the following:

- A licensed timber operator (LTO) must be utilized if any commercial tree species are to be removed from the site;
- Grow site development and road construction will be conducted in a manner that minimizes grading and soil disturbance;
- Avoid cultivating on steep slopes (greater than 30% grade) and disturbing any areas with landslides, gullies, and slips;
- Avoid construction and soil disturbance in the winter and/or during periods of wet weather;
- Seed, mulch, and/or rock areas that have been disturbed by grading, excavation, and/or road construction activities;
- Erosion control mats/blankets and wattles should be used to protect disturbed areas on steep slopes. Native grass seed will be applied to disturbed areas before installation of mats/blankets and wattles. Wattles will be installed on contour to prevent concentrating runoff and mats/blankets will be installed per manufacturer's

guidelines if necessary;

- Storm water drainage structures will not discharge onto unstable slopes, earthen fills, or directly to a watercourse. Drainage structures will discharge onto stable areas with straw bales, slash, vegetation, and/or rock riprap;
- All drainage and storm water infiltrations features will be assessed for their ability to withstand a 2-year storm event;
- Regularly check and maintain erosion control/drainage structures and keep culverts clear of debris;
- Haul away excess soil and other debris and locate any stockpiled materials in areas where they can be protected from erosion and will not discharge to a watercourse or lake;
- Compact and contour stored soil/spoils to mimic natural slope contours and drainage patterns to reduce the potential for fill saturation and failure, or erosion;
- Rip compacted soils prior to placing stored soil/spoils to prevent the potential for ponding which could lead to stored soil/spoil site failure and subsequent sedimentation;
- All necessary drainage/erosion control structures will be in place and functioning, and all areas of exposed soil as a result of grading will be stabilized as soon as possible after grading is complete and before any precipitation event that could cause erosion and/or deliver storm water runoff to a water body;
- Riparian zones will be avoided and vegetation should

be maintained to protect watercourses from growing operations;

- Do not service, fuel, or store equipment within 100 feet of surface water bodies;
- Store petroleum products in a covered building with secondary containment at least 200 feet away from surface water bodies;
- New roads will be planned and designed to stay as far away from watercourses as possible and to minimize the number of watercourse crossings;
- Decommission or relocate existing roads away from riparian zones whenever possible;
- Blade existing roads in dry weather, but while moisture is still present in soil to minimize dust and maximize compaction to prevent fine sediments from discharging from the road surface;
- Do not side cast bladed material to areas where it can enter a water body directly or be delivered to a water body during a storm event;
- Out-slope roads wherever possible to prevent the concentration of storm water flow within an inboard/inside ditch, to promote even drainage of the road surface, and to minimize disruption of the natural sheet flow pattern off a hill slope to a stream;
- If unable to eliminate inboard/inside ditches, line them with geotextile fabric and/or rock and ensure adequate ditch relief culverts to prevent down-cutting of the ditch and to reduce water runoff concentration and velocity;
- Neither in-sloped nor out-sloped roads will be allowed

to develop or show evidence of surface rutting or gulying. Use water bars and rolling dips to break- up slope length, diverting water to well-vegetated or armored areas. The distance between water bars and/or rolling dips should not exceed 150 feet, and that distance should be shortened for roads with steep grades (greater than 15%) or with an easily erodible surface;

- Use gravel to "weatherproof" roads used during the winter or wet weather periods;
- All road watercourse crossing structures will allow for the unrestricted passage of water and should be designed to accommodate the 100-year flood flow - consult CAL FIRE 100-year Watercourse Crossings document for examples and calculations (minimum of 18" diameter for all culverts);
- Road watercourse crossing structures on watercourses that support fish will be constructed for the unrestricted passage of fish at all life stages, and require permitting from CDFW;
- Culverts used at watercourse crossings will be of sufficient length to extend beyond fill/sidecast material, and will be installed at the same level and gradient of the stream bed in which they are being placed;
- Culverts used at watercourse crossings will be designed to direct flow and debris toward the inlet using wing-walls, beveling of the pipe, rock armoring, etc.;
- Low-water or ford style watercourse crossings will be armored along the bed and banks with clean durable rock of a sufficient size as not to move downstream

during high flow periods, yet without creating a damming effect on the flow - rock will be placed on either side to the break in slope to prevent water from diverting around the material;

- Stream crossing structures should be designed, constructed, and maintained to prevent stream diversion in the event that the crossing becomes plugged.

#### WETLAND/RIPARIAN PROTECTION AND MANAGEMENT

- Center Grow shall not disturb aquatic or riparian habitat, such as vernal pools, spawning sites, large wood, or shading vegetation unless authorized under a CWA section 404 permit, CWA section 401 certification, Regional Water Board WDRs (when applicable), or a CDFW LSA Agreement.
- Center Grow will maintain existing, naturally occurring, riparian vegetative cover (e.g., trees, shrubs, and grasses) in aquatic habitat areas to the maximum extent possible to maintain riparian areas for stream bank stabilization, erosion control, stream shading and temperature control, sediment and chemical filtration, aquatic life support, wildlife support, and to minimize waste discharge.

#### WASTEWATER AND SEWAGE MANAGEMENT

The subject property will utilize an existing conventional septic system that has been approved by Lake County Environmental Health and meets current state standards. Center Grow ensures:

- All human or animal waste is disposed of properly
- Onsite wastewater treatment systems (e.g., septic system) are permitted by the local agency;
- We will not use a cesspool for domestic or industrial

wastewater disposal;

- We will not install or continue use of an outhouse, pit-privy, pit-toilet, or similar device without approval from the County of Lake;
- Center Grow will not dispose of domestic wastewater unless it meets applicable local agency requirements.

#### MONITORING PERFORMANCE AND MANAGEMENT

Center Grow will conduct biannual monitoring inspections of the cultivation site, all associated facilities, all roadways associated with cannabis cultivation, and any water bodies potentially impacted by cultivation related activities. The first monitoring will occur annually by November 1<sup>st</sup> of each calendar, and will ensure the following criteria are met:

- All stockpiles, soil amendments, pesticides, and fertilizers have been properly stored and/or protected;
- Erosion and sediment controls have been properly installed and are functioning, and all areas of exposed soil have been stabilized in preparation for the winter wet weather period;
- Drainage structures (water bars/rolling dips) have been installed and are functioning on all access roads, and all access roads intended for use during the winter wet weather period have been weatherproofed;
- All trash/refuse has been cleaned up where it cannot pass into or be transported into any water body and empty/used containers have been properly disposed of per manufacturer's instructions;
- All water containment/storage ponds/dams have been inspected and appear to be in good, and stable condition;

The second monitoring inspection will occur annually after April 1st and before June 15<sup>th</sup> of each calendar year, and will ensure the following criteria are met:

- All stockpiles, soil amendments, pesticides, and fertilizers have remained properly stored and/or contained;
- Erosion/sediment controls implemented on bare soils have remained effective in preventing discharge of earthen materials and sediments off site;
- All access roads appear in good condition and erosion/sediment control has been effective in preventing discharge of earthen materials and sediment off- site;
- All permitted water containment structure/ponds/dams have remained effective and in good condition;

#### WRMP EVALUATION AND PERFORMANCE REPORTS

Based on the findings of the biannual monitoring inspections, Center Grow will assess the efficacy of the WRMP. If monitoring shows that measures implemented have proven effective, we will report the findings continue to inspect the site biannually. If the measures implemented on site have proven ineffective, we will submit a remediation plan to the CVRWQCB as well as a timeline for work to be accomplished. The remediation plan will include proof that any permits required to complete the intended work will be obtained in a timely fashion to the appropriate regulatory agency. All data collected by site inspection will be shared with all concerned Lake County agencies.

#### REVIEW

Center Grow will review the Water Resources Management Plan on an annual basis, in conjunction with the review of the Water Uses Management Plan.



## COMPLIANCE

We are enrolled in Tier 2 of The Central Valley Regional Water Quality Control Board pilot program regulating the discharge from cannabis cultivators and ensuring the cultivation site meets all standard conditions.

A copy of the Central Valley Regional Water Quality Control Board BMP for Cannabis Cultivation will be kept on site at all times.

As of the date of this application, we hold the following permits:

- Tier II Central Valley – Notice of Applicability

## WATER USE MANAGEMENT PLAN

Center Grow is applying for Commercial Cannabis Cultivation Major Use Permit (Type 3A) in Lake County, California. Accordingly, Center Grow proposes to implement the following Water Use Management Plan.

## PURPOSE

The Water Use Management Plan (WUMP) has been designed to conserve the County's water resources and establish best management practices to ensure the plan is followed at all times, as well as is in full compliance with applicable local, county, and state regulations.

Center Grow's Water Use Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to the County of Lake and appropriate local agencies.

## SCOPE

The Center Grow Water Use Management Plan focuses on the

## COMPLIANCE

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A copy of the Central Valley Regional Water Quality Control Board BMP for Cannabis Cultivation will be kept on site at all times.

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## WATER USE MANAGEMENT PLAN

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### PURPOSE

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Center Grow's Water Use Management Plan includes measures to monitor and evaluate the performance of the plan, as well as ensure that all data and information is reported to the County of Lake and appropriate local agencies.

### SCOPE

The Center Grow Water Use Management Plan focuses on the

following:

- Developing and maintaining a safe, clean, and reliable water supply;
- Meeting all legal requirements for the use of water resource located on the property and providing documentation of legal compliance;
- Monitoring the quantity of water used for the cultivation of cannabis;
- Designing a water efficient delivery system and irrigation system for cannabis cultivation. All employees are required to follow the procedures outlined in this plan;

## OVERVIEW

From the collection box, water is delivered 100 feet uphill to a 2500-gallon collection tank system at the cultivation site. When tanks are full a mechanical float switch diverts water back to the source.

Applicant will not engage in any unlawful drawing of surface water. Applicant will not use water provided by a public water supply, unlawful water diversions, transported by a water hauler, bottled water, a water vending machine or a retail water facility. The subject property is outside any County Water District "Exclusion Areas."

## WATER STORAGE (BMPs)

Center Grow will install vertical storage tanks according to manufacturer's specifications and place the tanks on properly compacted soil that is free of rocks and sharp objects and capable of bearing the weight of the tank and its maximum contents with minimal settlement. Water will be stored

polyethylene water tanks with a total of 8,500 gallons of water stored at the cultivation facility.

New storage tanks will be located in areas with great slope stability and at the cultivation site. To prevent rupture or overflow and runoff, Center Grow will only use water storage tanks and bladders equipped with a float valve, or equivalent device, to shut off diversion when storage systems are full. All vents and other openings on water storage tanks will be designed to prevent the entry and/or entrapment of wildlife. We will also monitor the meter on a regular basis to ensure excess water is not being used.

### IRRIGATION SYSTEM

Daily watering of cannabis will be achieved by hand watering or via a drip irrigation system powered by a 1HP jet pump and pressure tank system. In the event that drip and trickle line irrigation is utilized the watering will be administered by a timed irrigation controller, set to irrigate during the nighttime when the evaporation rates will be the lowest. Drip lines will be sized to irrigate large areas slowly, to maximize absorption, and will be placed under a layer of straw mulch. Hose bibs will be stationed throughout the cultivation area for spot watering.

### IRRIGATION & SPRINKLERS (BMPs)

The following are irrigation best management practices implemented by Center Grow:

- The site will utilize a drip irrigation system with a schedule that requires use of as little water as possible;
- Regularly inspect our entire water delivery system for leaks and immediately repair any leaky faucets, pipes, connectors, or other leaks;

- Replace worn, outdated, or inefficient irrigation system components and equipment to ensure a properly functioning, leak-free irrigation system at all times;
- Install according to the irrigation design specifications, locally applied codes and standards, and manufacturers' product requirements;
- Actively manage the system and adherence to all applicable watering limitations;
- Ensure sprinkler heads and nozzles will apply water uniformly to the target area;
- Match the precipitation/application rate of the sprinklers for each zone (+/- 5 percent);
- Designed to reduce overspray of impervious surfaces or adjacent planting areas, and prevent runoff of water
- Avoid low head drainage;
- Drip irrigation will be utilized instead of spray sprinklers in narrow or complex shaped areas;

#### MONITORING PERFORMANCE OF WATER USE

Center Grow will maintain records of diversion with separate records that document the amount of water used for cannabis cultivation separated out from the amount of water used for other irrigation purposes and other beneficial uses of water (e.g., domestic, fire protection, etc.). These records will be available upon request from the Water Boards or any other authorized representatives of the state.

Center Grow will share data relating to the cost of implementing the water management plan with the County as requested.

## EVALUATING PERFORMANCE OF THE WATER USE MANAGEMENT PLAN

Annually, Center Grow will review the Water Use Management Plan and recorded logs in conjunction with the reviews of all management plans. Upon review, Center Grow will address any outstanding issues immediately. Additionally, a professional evaluation of the water plan will occur annually with the goal of improving water management practices.

## CALIFORNIA DROUGHT DECLARATIONS

Center Grow recognizes that on occasion, the Governor of California and the Lake County Board of Supervisors has and likely will continue to periodically issue a proclamation of a local or state emergency based on drought conditions on any given year. In the event of such a Declaration, Center Grow will abide by all emergency regulations adopted in response to drought conditions.

## EMERGENCY USE PLAN

In the case of an emergency that a retail water is needed, Center Grow will work with a licensed retail water supplier as defined by Section 13575 of the Water Code and provide the following information to the Department in 7 days:

- A description of the emergency;
- Identification of the retail water supplier including license number;
- Volume of water supplied;
- Actions taken to prevent the emergency in the future

## WATER USE PLAN COMPLIANCE

The Water Use Plan has been developed in compliance with the appropriate local, county, and state laws that pertain to the Water

Use. These include:

- Cannabis Cultivation Policy & California State Water Resources Board;
- California Code of Regulations, Title 3 Food and Agriculture, Division 8 Medical Cannabis Cultivation, Section 8107;
- County of Lake Ordinance 3703;
- Division of Water Rights, Principles and Guidelines for Cannabis Cultivation.

#### REVIEW

Director of Cultivation, Jason Jones will review the Water Use Plan on an annual basis and will share data relating to the cost of implementing this plan with the County as requested.

#### AIR QUALITY MANAGEMENT PLAN

Center Grow is applying for a Commercial Cannabis Cultivation Major and Minor Use Permit (Type 3A) in Lake County, California.

#### PURPOSE

Center Grow's Air Quality Management Plan (AQMP) is designed to promote the health, safety, welfare; environmental quality, and reduce potential for nuisance.

Our Air Quality Management Plan includes measures to monitor and evaluate the performance and implementation of the plan, as well as ensure that all data and information is reported to the appropriate local agencies.

#### SCOPE

The Center Grow's Air Quality Management Plan is as follows: