

Cannabis Operation

**20150 Black Bass Pass Road
Lower Lake, CA 95457**

GREENFIELD FARM

PROPERTY MANAGEMENT PLAN (PMP) FOR CANNABIS OPERATIONS

Risk Level: Tier 2, Low

March 11, 2025

Project Contacts

PROJECT INFORMATION

Name of Project: Cannabis Operations Project
Project Location: 20150 Black Bass Pass Road, Lower Lake, CA 95457

CULTIVATOR INFORMATION

Name: Sergey Yusupov
Address: 3072 Vichy Avenue, Napa, CA 94558
Email: mailalex44@gmail.com
Phone Number: (415) 696-8850

Project Description

PROJECT SUMMARY

The project site comprises of approximately 40.56 acres and is located at 20150 Black Bass Pass Road, Lower Lake, CA. The project site is located approximately 650 feet east of Spruce Grove Road and approximately 7.9 miles east of the town of Lower Lake.

Outdoor cannabis cultivation will occur on approximately 2 acre of the project site which is approximately 5 percent of the total project site area. The project will be applying for two acres of outdoor canopy with (2) A-Type 3 Outdoor licenses and a Type 13 Distribution, Self-transport only license utilizing seasonal ag-exempt hoop structures not exceeding 20' wide, 12' high, and 150' in length. The hoop structures do not trigger the need for PRC 4290, 4291 compliances as there are no permanent structures proposed. A fence enclosure, trash bins, and portable toilet are also proposed to be associated with this project. Plants are to be planted in above ground planter beds or bags.

Table of Contents

Table of Contents	iii
Section 1 Air Quality	1
1.1 Purpose	1
1.2 Scope	1
1.3 Overview	1
1.4 Roles and Responsibilities.....	1
1.5 Minimizing Odor, Air Pollution and Particulates.....	2
1.6 Odor Complaint or Nuisance Management (BMPs)	3
1.7 Reporting Performance of AQMP	4
1.8 Ongoing Review.....	4
Section 2 Cultural Resources.....	5
2.1 Purpose	5
2.2 Scope	5
2.3 Overview	5
2.4 If Cultural Resources are Discovered (BMPs)	5
Section 3 Energy Usage	6
3.1 Purpose	6
3.2 Scope	6
3.3 Overview	6
3.4 Energy Calculation	7
3.5 Energy (BMPs).....	8
3.6 Monitoring and Benchmarking Performance of EMP	9
3.7 Reporting Performance of EMP	9
Section 4 Fertilizer Usage.....	10
4.1 Purpose	10
4.2 Scope	10
4.3 Overview	10
4.4 Fertilizer Application (BMPs)	11
4.5 Fertilizer Storage (BMPs).....	11
4.6 Evaluating Performance of FMP	12
4.7 Employee Training	12
4.8 Review.....	13
Section 5 Fish and Wildlife Protection.....	14
5.1 Purpose	14
5.2 Scope	14
5.3 Overview	14
5.4 Habitats on Lot of Record	14
5.5 Watershed Description	15
5.6 Impact Mitigation Strategies.....	15
5.7 Evaluating Performance of FWMP	15
5.8 Reporting Performance of FWMP.....	16
Section 6 Operations Manual	17
6.1 Purpose	17
6.2 Scope	17
6.3 Authorization to Verify	17
6.4 Staff Screening	17
6.5 Facility Operation Hours	18

6.6	Transportation data	18
6.7	Facility Carbon Footprint	18
6.8	Chemical Storage and Effluent.....	18
6.9	Site Maintenance Protocol.....	18
6.10	Planting/Cultivation Plan.....	19
6.11	Evaluating Performance and Reporting of the Operations Manual Review	19
Section 7	Pest Management	20
7.1	Purpose	20
7.2	Scope	20
7.3	Overview	20
7.4	Pest Deterrence.....	20
7.5	Worker Protection (BMPs).....	21
Section 8	Security.....	22
8.1	Purpose	22
8.2	Scope	22
8.3	Overview	22
8.4	Security (BMPs).....	22
8.5	Onsite Security	23
8.6	Suspicious Activity Protocol	23
8.7	Visitor Log Requirements	24
8.8	Theft and Loss Prevention (BMPs)	24
8.9	Video Surveillance	26
8.10	Information Technology Security (BMPs)	27
8.11	Security Personnel	27
8.12	Review.....	28
Section 9	Stormwater Management.....	28
9.1	Purpose	28
9.2	Scope	28
9.3	Overview	28
9.4	Protecting Downstream Water Bodies from Water Quality Degradation.....	29
9.5	Topsoil, Fertilizers, and Pesticide Risks.....	29
9.6	Illicit Non-Point Source Discharge Will Be Eliminated.....	29
9.7	Public Roads.....	30
9.8	Compliance with the Requirements of Chapter 29, Stormwater Management Ordinance of the Lake County Ordinance.....	30
9.9	Proposed Grading.....	30
9.10	Stormwater (BMPs).....	30
9.11	Construction Storm Water Management Plan	31
9.12	Parameters and Methods of Monitoring	31
9.13	Review.....	32
Section 10	Waste Management.....	33
10.1	Purpose	33
10.2	Solid Waste.....	33
10.3	Hazardous Waste Management Plan	36
10.4	Cannabis Vegetative Material Waste Management Plan Overview	40
10.5	Estimated Medium Usage.....	42
Section 11	Water Resources.....	45
11.1	Purpose	45
11.2	Scope	45
11.3	Overview	45

11.4	Watershed Description	46
11.5	Water Conservation (BMPs)	46
11.6	Erosion, Sediment, Roads, and Stormwater (BMPs).....	46
11.7	Wetland/Riparian Protection and management	48
11.8	Wastewater and Sewage Management	49
11.9	Monitoring Performance and Management	49
11.10	WRMP Evaluation and Performance Reports	50
11.11	Review.....	50
11.12	Compliance.....	50
Section 12	Water Use.....	51
12.1	Purpose	51
12.2	Scope	51
12.3	Overview	51
12.4	Water Storage (BMPs).....	52
12.5	Irrigation System	52
12.6	Monitoring Performance of Water.....	53
12.7	Evaluating Performance of the Water Use Management Plan	53
12.8	California Drought Declarations	53
12.9	Emergency Use Plan.....	53
12.10	Water Availability Analysis	54
12.11	Review.....	54
Appendix A:	<i>Fertilizer Information.....</i>	A
Appendix B:	<i>Lighting Information.....</i>	B
Appendix C:	<i>Security Camera Information.....</i>	C
Appendix D:	<i>Additional Documents</i>	D

Section 1 Air Quality

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California.

1.1 PURPOSE

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

The 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.

1.2 SCOPE

The Greenfield Farm'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 Greenfield Farm'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.

1.3 OVERVIEW

Greenfield Farm 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. Greenfield Farm's cultivation site is located off a small private road that connects to Black Bass Pass and then to Spruce Grove Road. Our proposed cultivation site will comply to all reasonable complaints filed by our neighbors within 1,000 ft. of the proposed site. If there is an odor complaint Greenfield Farms will respond immediately with a phone call and immediate attention to the complaint filed.

1.4 ROLES AND RESPONSIBILITIES

Sergey Yusupov, Director of Cultivation will be personally responsible for responding to any complaints by neighbors.

Greenfield Farm will supply neighboring landowners with the personal contact information for Sergey Yusupov.

1.5 MINIMIZING ODOR, AIR POLLUTION AND PARTICULATES

Greenfield Farm 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 soil from site;
- Emission from gas powered tractor, woodchipper, and other equipment;
- Odor from processing facility and cultivation site;

DUST FROM GRAVEL ROAD (BMPs)

Greenfield Farm understands that unpaved roads can be a potential source of air pollutants. This problem generally occurs during the dry season from May through October. Greenfield Farm will have BMPs in place to mitigate particulate matter from entering the air from vehicles of visitors or employees. Mainly, Greenfield Farms will have traffic signs indicating desired vehicle speed. 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 dirt 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)

Greenfield Farm 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.

EMMISSION FROM TRACTOR AND OTHER EQUIPMENT (BMPs)

Greenfield Farm expects to use the following equipment, which could impact air quality, for cannabis cultivation related activities:

- Gas powered Tractor
- Gas powered woodchipper
- Gas powered brush cutter
- Gas powered lawnmower
- Gas powered chainsaw

In order to mitigate potential effects on air quality from the named farm equipment, Greenfield Farm 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 cannabis industry standard for the elimination of cannabis odor. Additional HEPA filters will be installed and used to eliminate harmful bacteria and particulates.

Greenfield Farm 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, 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.

1.6 ODOR COMPLAINT OR NUISANCE MANAGEMENT (BMPS)

Sergey Yusupov 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 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 hour 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, Greenfield Farm 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;

Greenfield Farm will monitor and document the performance of the Air Quality Management Plan implemented at the premises.

On an annual basis, Greenfield Farm will review all documentation pertaining to the performance of the Air Quality Management Plan as to determine if the risk of nuisance odors is within acceptable tolerances or ranges or can be mitigated further by implementing new best management practices.

1.7 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.

1.8 ONGOING REVIEW

Director of Cultivation, Sergey Yusupov, 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 air quality.

Section 2 Cultural Resources

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California and as such will adopt a Cultural Resources Plan.

2.1 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, Greenfield Farm'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.

2.2 SCOPE

Greenfield Farm 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 Sergey Yusupov, Director of Cultivation.

2.3 OVERVIEW

A cultural resources survey was conducted at 20150 Black Bass Pass Road in Lower Lake, on March 10th, 2020, by Flaherty Cultural Resource Services. The surveyed area consisted of approximately 7 acres, encompassing the proposed cultivation areas on Greenfield Farm on the subject parcel. No cultural resources were discovered within the project boundaries. There were also letters sent out to all the local reservations and tribes associated with this location. There was no record of any archeological resources found on the parcel (APN 012-052-02) including the proposed cultivation area.

2.4 IF CULTURAL RESOURCES ARE DISCOVERED (BMPS)

All activities in the vicinity of the find(s) will be temporarily ceased;

- Contact will be made with a qualified archeologist to evaluate the find(s) and to recommend mitigation procedures, if necessary. All evaluation and mitigation procedures to be in accordance with Section 15064.5 of the California Environmental Quality Act per Flaherty Cultural Resource Services recommendations.

Greenfield Farm does not expect any expansion to the cultivation site; however, before any expansion of current site or development of property is commenced, a revised property management plan and site plan will be submitted to the appropriate jurisdictions by Sergey Yusupov, Director of Cultivation.

Section 3 Energy Usage

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Upon receiving permits from Lake County, CA, Greenfield Farm will implement this Energy Plan.

3.1 PURPOSE

Greenfield Farm 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) is to outline objectives and goals for Greenfield Farm to achieve and identify key strategies and operational procedures that will reduce energy use and consumption.

Greenfield Farm'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.

3.2 SCOPE

The Greenfield Farm 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

3.3 OVERVIEW

The EMP applies to all operations performed at Greenfield Farm's cultivation site and that consume energy resources. This includes the usage of all machinery used during the cultivation process cannabis.

The primary goal and objective for the EMP is to establish reliable baseline metrics and benchmark standards for the performance and efficiency of Greenfield Farm'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 Sergey Yusupov, Director of Cultivation.

3.4 ENERGY CALCULATION

The following is energy calculation for the proposed permits:

Appliance	Number in Use	Watts/Unit	Hrs./Day	Total Watts/day
Dehumidifier	4	600	12	28,800
CFL Bulbs	60	13	5	3,900
Whole Space AC	1	7125	4	28,500
Computers	2	120	5	1,200
T5 Grow Light	N/A	84	12	0
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
Security System	1	450	24	10,800
Water Pump	2	2000	2	8,000

TOTAL WATTS PER DAY	83779
KWh/DAY	83.78
KWh/MONTH	2,513.4

HOOP STRUCTURES ENERGY CALCULATIONS

Hoop structures will not be using any artificial lighting. A generator will be onsite as supplementary power during inclement weather for security lighting. The project plans on using no artificial lighting and will rely only on light deprivation for its hoop structures. For more information and energy calculations please refer to Appendix B.

3.5 ENERGY (BMPS)

Greenfield Farm 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, Greenfield Farm 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

Greenfield Farm plans to install a solar array at its grow site to reduce energy consumption. Greenfield Farm intends to operate at 50% alternative energy use by June 1, 2024. Solar panel size: will be determined upon solar consultant site visit and the information will be added to the report as necessary.

ENERGY CONSERVATION MEASURES

Due to global climate change increasing the concern for public health and environmental impact, California has enacted laws to offset greenhouse gas emissions. As recommended by the Department's Literature Review on the Impacts of Cannabis Cultivation, the cultivator is required to show evidence of carbon offsets. Greenfield Farms will

be in compliance with CCR Title 3, Division 8, Chapter 1, Section 8305. This project proposes being 50% solar powered energy for cultivation purposes by summer 2023.

3.6 MONITORING AND BENCHMARKING PERFORMANCE OF EMP

Greenfield Farm 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
- Energy saving alternatives to machinery
- Operational procedures

3.7 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.

Section 4 Fertilizer Usage

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California, and therefore Greenfield Farm submits this Fertilizer Management Plan.

4.1 PURPOSE

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

Greenfield Farm 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.

4.2 SCOPE

The Greenfield Farm 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;
- Proper storage of fertilizers;
- Proper response to fertilizer spills and cleanup;
- 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 Sergey Yusupov, Director of Cultivation.

4.3 OVERVIEW

Greenfield Farm approaches soil fertility from an organic and biological perspective. The farm shall use only amendments to the soil and only organic fertilizers. Biologically active soil optimizes plant health, reduces the need for fertilizers, increases plants abilities to fight insect infestation, and reduces irrigation rates overall. Greenfield Farm 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. The bulk soil proposed to be used is Cold Creek Compost's Growers Choice Elite soil. Amendments are added in the spring to adjust mineral balance for the growing season.

To limit infiltration and water quality degradation, Greenfield Farm 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.

4.4 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.

4.5 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

Greenfield Farm 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.

4.6 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.

4.7 EMPLOYEE TRAINING

Greenfield Farm 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 cleanup;
- 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:

Greenfield Farm will be Organic Certified. Greenfield Farm will only amend the organic bulk soil.

Our Added Amendments to Soil

- Worm Castings (3-5 Gallons Per Yard)
- Organic Bat Guano (12% Nitrogen, 12%Phosphorus, and 2.5% Potassium)
- Organic Granular Kelp (1.0% Nitrogen, 15% Phosphorus, and 2% Potassium)
- Organic Humus Soil (3-5 Gallons per Yard)
- Organic Fish Powder (15% Nitrogen, 0.5% Phosphorus, and 0.5% Potassium)
- Fish Bone Meal (4% Nitrogen, 17% Phosphorus, and 0% Potassium)
- Shrimp Meal (6% Nitrogen, 6% Phosphorus and Calcium,and 0% Potassium)

4.8 REVIEW

Director of Cultivation, Sergey Yusupov, 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.

Section 5 Fish and Wildlife Protection

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California, and therefore implements the following Fish and Wildlife Management Plan.

5.1 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 Greenfield Farm is in no way destructive to the local habitat.

5.2 SCOPE

The Greenfield Farm Fish and Wildlife Management Plan (FWMP) 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
- Any potential effects the proposed cannabis cultivation may have on the fish and wildlife
- Methods to minimize adverse impacts on the fish and wildlife;
- All employees are required to follow the procedures outlined in this plan.

5.3 OVERVIEW

The parcel is approximately 40.56 acres of woodland and grassland containing black oak and blue oak, a small conifer component, and mainly native brush. Greenfield Farms minimized impacts on fish and wildlife by applying an erosion control plan by hydroseeding with an erosion mix that consists of native species. Our erosion control methods consist of wattles, weed-free rice straw, rip rap rock in all drainage outlets, and rock check dams.

5.4 HABITATS ON LOT OF RECORD

The lot of record includes two prevailing habitat types: (1) Woodland; (2) Mixed Riparian Forest

HABITAT DESCRIPTION FOR SUBJECT REAL PROPERTY

Woodland:

Woodland is a low-density forest forming open habitats with plenty of sunlight and limited shade. Woodlands may support an understory of shrubs and herbaceous plants including grasses. Woodland may form a transition to shrubland under drier conditions or during early stages of primary or secondary succession.

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 are 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 cottonwoods and medium sized arroyo willows and black willows.

5.5 WATERSHED DESCRIPTION

Greenfield Farms is located in the Lower Sacramento River Watershed. The cultivation site is greater than 100 feet from the class II water course and 150 feet from Class I water course on the property.

5.6 IMPACT MITIGATION STRATEGIES

Greenfield Farm 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;
- 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;
- Greenfield Farm 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;
- Greenfield Farm 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

5.7 EVALUATING PERFORMANCE OF FWMP

To evaluate the effectiveness of the FWMP, Greenfield Farm 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.

5.8 REPORTING PERFORMANCE OF FWMP

All data collected by Greenfield Farm 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;
- Sergey Yusupov 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. Greenfield Farm has received the following certification(s):
 - Enrolled in Tier 2 of the Central Valley Regional Water Quality Control Boards Cannabis Wastewater 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)

Section 6 Operations Manual

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California; and as such proposes the following Operational Manual.

6.1 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.

6.2 SCOPE

The Greenfield Farm 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.

6.3 AUTHORIZATION TO VERIFY

Greenfield Farm 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.

6.4 STAFF SCREENING

All Greenfield Farm 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 Greenfield Farm, three professional references, and three personal references. Prospective employees whose applications and references have been approved will be granted a formal interview by Sergey Yusupov. 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. Greenfield Farm 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.

6.5 FACILITY OPERATION HOURS

Monday-Saturday 7am-6pm. Facility will be open to authorized staff. Deliveries and pickups will only occur between Monday – Saturday 9am-5pm. Facility will be closed to the public.

6.6 TRANSPORTATION DATA

This project proposes having three seasonal employees every year during the growing season. The grow season for employees will range from May till November. The projects estimates having two commuter vehicles for employees making a round trip to the site daily. The project also anticipates One truck to be driven by Sergey (cultivator) making one daily trip. Any deliveries to the project site will be scheduled in advance to minimize daily trips as much as possible. The project has three regular parking spaces and one handicap parking space per Article 46.11. Transportation data will be documented and reviewed annually for performance standards and possible methods to reduce daily trips.

6.7 FACILITY CARBON FOOTPRINT

Greenfield Farm 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.

6.8 CHEMICAL STORAGE AND EFFLUENT

Greenfield Farm 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.

6.9 SITE MAINTENANCE PROTOCOL

When not in use, all Greenfield Farm 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 workday have been return to designated storage area in an organized fashion. Any refuse created during the workday 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 Greenfield Farm 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 dirt 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.

6.10 PLANTING/CULTIVATION PLAN

The cannabis cultivation plan will include planting for two acres of outdoor cultivation. The outdoor cultivation will be planted in raised planter bags. Planting will occur once the Major Use Permit is approved. For the following years, outdoor cultivation planting will begin in June and harvesting will commence in November. For the regular cultivation season (upon approval of Use Permit), outdoor cultivation will occur on 2 acres with a total canopy of 43,560 square feet.

6.11 EVALUATING PERFORMANCE AND REPORTING OF THE OPERATIONS MANUAL REVIEW

Greenfield Farm Director of Cultivation, Sergey Yusupov, 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.

Section 7 Pest Management

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Greenfield Farm will implement the following Pest Management Plan.

7.1 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.

Greenfield Farm 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.

7.2 SCOPE

The Greenfield Farm 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.

7.3 OVERVIEW

Greenfield Farm 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, Greenfield Farm 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.

7.4 PEST DETERRENCE

Greenfield Farm 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

Greenfield Farm 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 Greenfield Farm:

- Pesticides shall be applied only when pollinators are not present;
- 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.
- 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

7.5 WORKER PROTECTION (BMPS)

In the case of pesticide use, Greenfield Farm 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

Section 8 Security

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Upon receiving receipt of this permit Greenfield Farm will implement the following Security Management Plan.

8.1 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.

Greenfield Farm'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.

8.2 SCOPE

Greenfield Farm 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.

8.3 OVERVIEW

Greenfield Farm'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.

Greenfield Farm will have security to minimize criminal activity, provide for safe and secure working environments, protect private property, and to prevent damage to the environment. The applicant shall provide adequate security on the premises, as approved by the Sheriff and pursuant to this section, including lighting and alarms, to ensure the safety of persons and to protect the premises from theft.

8.4 SECURITY (BMPS)

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

8.5 ONSITE SECURITY

The Cultivation Site will be protected by a 6' perimeter livestock fence, with cemented metal posts on 8' intervals. All terminal posts will be set in concrete. The site is naturally screened from neighboring properties by brush and tree cover. The entrance to the site will be secured by a 14-foot 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 loudspeakers built into the video monitoring equipment.

8.6 SUSPICIONS ACTIVITY PROTOCOL

All suspicious activity will be recorded via security cameras. In the event that law enforcement is required, the designated Greenfield Farm employee will notify the Lake County Sheriff's Department, and other agencies as appropriate and 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 Greenfield Farm, Sergey Yusupov 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. Sergey Yusupov 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, Sergey Yusupov or the designated

employee will notify all employees.

Digital Breach: Sergey Yusupov 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.

8.7 VISITOR LOG REQUIREMENTS

Greenfield Farm 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 Greenfield Farm management team, in particular Sergey Yusupov.

8.8 THEFT AND LOSS PREVENTION (BMPS)

Greenfield Farm 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 check-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 Greenfield Farm 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, Sergey Yusupov 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

Greenfield Farm 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 Greenfield Farm with required information to be worn when in restricted on areas on the farm. Information includes Greenfield Farm’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 Greenfield Farm 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 Greenfield Farm. All restricted areas and point of entry and exit on the premises are securely locked using commercial-grade locks.

Greenfield Farm 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 Greenfield Farm 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.
- Greenfield Farm management team will verify the vendor’s identity by requesting government-issued ID and checking information against a manifest of vendor drivers. Greenfield Farm 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 Greenfield Farm management team.
- All discrepancies are to be reported to the appropriate law enforcement, local and state agencies.
- In the case of any theft, Greenfield Farm will notify the local law enforcement and/or the state bureau.

8.9 VIDEO SURVEILLANCE

The facility will be protected by a 1080 pixel 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 rights-of-way 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. 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.

8.10 INFORMATION TECHNOLOGY SECURITY (BMPS)

Greenfield Farm 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 Greenfield Farm 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.

8.11 SECURITY PERSONNEL

If Sergey Yusupov and management deem that outside security personnel are necessary, Greenfield Farm 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 Greenfield Farm comply with Chapters 11.4 and 11.5 of Division 3 of the Business and Professions Code.

8.12 REVIEW

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

Emergency Contact Personnel: *Sergey Yusupov (707) 972-8123; email urclebuds@yahoo.com*

Section 9 Stormwater Management

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California, and accordingly is implementing the following Storm Water Management Plan.

9.1 PURPOSE

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

Greenfield Farm Storm Water 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.

9.2 SCOPE

The Greenfield Farm Storm Water Management Plan focuses on the following: Protecting its water bodies (Class I, II, & III water courses) from water quality degradation from activities and uses associated with cannabis cultivation such as use of topsoil, fertilizer, etc.

Greenfield Farm Storm Water will not discharge to adjacent water bodies or properties. Greenfield Farm will be in compliance with the Lake County Storm Water Management Ordinance; and Grading Ordinance. Greenfield Farm shall utilize best management practices for construction and post-construction activities.

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

9.3 OVERVIEW

Greenfield Farm prepared an outdoor cultivation site in the least possible impact area for stormwater runoff. All diffused stormwater is sloped to the south of the site. There is a primary and a secondary sediment trap. The primary sediment trap located to the south of the proposed cultivation site with wattles, seed, and straw surrounding it. The seed protects and stabilizes the soil, the straw slows the water and the wattles filter out any unwanted contaminants. The secondary rock check dam and sediment trap is located on the lower end of the proposed cultivation site. The rock check dam has rip rap rock, seed, wattles and straw bales surrounding it. All diffused surface water shall be slowed by the mulch from the hydroseed and the straw and wattles protecting any receiving water bodies. To protect the diffused surface water in compliance with section 122.26 the stormwater system of Lake County.

Greenfield Farm recognizes that the protection of surface waters is paramount to the operation of an environmentally friendly cannabis farm. Surface contamination from roads is a problem in Lake County, and other rural communities.

The Greenfield Farm property contains existing roads for the purpose of ingress and egress to the cultivation site. The storm water management plan will address some of the remaining smaller issues that may, under extreme precipitation events, result in distribution of sediment to waterways, to further address chronic issues associated with the existence of roads through best management practices; and to ensure that there is no risk of contamination via fertilizer or chemicals. Greenfield Farm has already eliminated direct storm water impacts from the road system we will continue to reduce potential risk of impacts to surface waters.

9.4 PROTECTING DOWNSTREAM WATER BODIES FROM WATER QUALITY DEGRADATION

Greenfield Farm will manage storm water by continuing to upgrade the road system, implement measures to prevent potential of contamination from fertilizers and chemicals, implement best management practices, and train personnel about best management practices and emergency waste discharge response.

9.5 TOPSOIL, FERTILIZERS, AND PESTICIDE RISKS

The cultivation site will include agricultural BMPs, as well as storm water BMPs that help create a healthy, and clean agricultural system. The implementation of an Integrated Pest Management creates an environment where pesticides, herbicides, and fungicides can usually be avoided and so these chemicals are not used on the farm. Not having them present is the first step in ensuring that they cannot contaminate any waterways. Well maintained biologically alive soils aid in plant nutrient uptake. All fertilizers applied are biologically based and organic in nature. Liquid fertilizer, the kind that is most likely to contaminate waterways, will not be used on site. With regard to topsoil, the agricultural BMPs that insure it remains on site include, cover crops, 100% ground cover and mulches, and avoidance of mechanical compaction of the soil.

9.6 ILLIXIT NON-POINT SOURCE DISCHARGE WILL BE ELIMINATED

Greenfield Farm recognizes that the greatest risk of storm water discharge and potential sediment delivery to receiving waters is often from the dirt surfaced interior road system. The property road system will be maintained to reduce this risk. Greenfield Farm will ensure that drainage features on the existing roads are designed to avoid possible connection to receiving waters, and instead to discharge to wooded areas for infiltration. If necessary, water bars and rolling dips were installed at appropriate locations to slow the surface flow of storm water runoff and reduce flow to any culverts located on the road system.

For activities related to the cultivation of cannabis, Greenfield Farm intends to cultivate on areas of the property with gradual slope <30%. A year-round groundcover of native and pasture grasses will be maintained over the entire site. Disturbance activities will not be conducted during the wet season, Oct 15 to April 15, and cover crops will be

used in the canopy area during the winter.

9.7 PUBLIC ROADS

Black Bass Pass Road is a county dedicated public road. The use of this public road to and from the Greenfield Farm property will not result in an impact to downstream hydrologic structures nor the geomorphological features of waters of the state. This is due to the fact that discharge will not increase and the turbidity of waters that are turbid will decrease do to monitoring, maintenance and systematic implementation of BMPs. This will result in a net positive impact on downstream hydrologic features, both natural and manmade.

There is no risk of increase in stream discharge from the property because soil infiltration capacity is not being decreased, storm water drainage systems such as ditches release water onto hill slopes where it infiltrates, rather than directly into streams, and there are no stream diversions.

9.8 COMPLIANCE WITH THE REQUIREMENTS OF CHAPTER 29, STORMWATER MANAGEMENT ORDINANCE OF THE LAKE COUNTY ORDINANCE

Greenfield Farm has reviewed the Lake County Storm Water Management Ordinance and finds the project to be in compliance with the ordinance. This project minimizes development, meets Regional Water Quality Control Board requirements, as has been enrolled in the general discharge waiver program since September 2019, and does not require an NPDES storm water management plan or SWPPP.

9.9 PROPOSED GRADING

Any proposed grading at the cultivation site will be done on an area with an average slope of less than 10%. This location is more than 100 to 150 feet from surface waters and has a native vegetative buffer strip intact for over 100 feet surrounding the entire garden. Any project grading will utilize all available and required BMP's and commence only once all applicable permits have been acquired.

9.10 STORMWATER (BMPS)

Greenfield Farm will implement a storm water management plan to protect waterways and water bodies from runoff and erosion. The property uses the following design measures and operational tactics to minimize harmful run off from reaching any water ways or water bodies.

Site Design Measures (BPMs): Locate cultivation site more than 100 feet from any spring or top bank. Locate covered storage areas more than 100 feet from any spring or top bank

Minimize compaction of highly permeable soil and use of impervious surfaces. Limit clearing and grading of native vegetation at the site to the minimum area needed to build the project, allow access and provide fire protection.

Minimize use of impervious surfaces by concentrating development on the least- sensitive portions of the site, while leaving the remaining land in a natural, undisturbed state.

Erosion and Sediment Prevention Methods (BMPs) Hire an experienced, reputable, and licensed operator to conduct operations if heavy equipment is required to develop roads and the grow site. Minimize grading and soil disturbance during grow site development. Native grass seed will be applied outside of the cultivation area to disturbed areas before installation of mats/blankets and wattles. Storm water drainage structures should not discharge onto unstable slopes, earthen fills, or directly to a watercourse. Drainage structures should discharge onto stable areas with straw bales, slash, vegetation, and/or rock riprap. Greenfield Farm will check and maintain erosion control/drainage structures and keep culverts clear of debris. Remove excess soil and other debris and place used material in safe and dry environment. All necessary control structures should be in place and functioning, and all areas of exposed soil because of grading should 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 will be maintained to protect water courses from growing operations.

9.11 CONSTRUCTION STORM WATER MANAGEMENT PLAN

Greenfield Farm does not anticipate any new construction at the cultivation site or on property other than the construction and use of prefabricated storage facilities; fencing the and installation of water tanks. However, Greenfield Farm will implement a Low Impact Development (LID) strategy when possible.

Greenfield Farm will implement construction (BMPs) by scheduling construction activities during dry weather and keep grading operations to a minimum during the rainy season.

Protect and establish vegetation to prevent dislodging and transporting of soil. Train and educate construction crews and personnel to better understand the effects of storm water pollution from construction projects and learn ways to prevent or minimize pollution on the job.

Stabilize construction entrances and exits to prevent tracking onto roadways. Protect exposed slopes from erosion through preventative measures such as covering the slopes to avoid contact with storm water by hydroseeding, applying mulch and/or using plastic sheeting. Use brooms and shovels whenever possible to maintain a clean site instead of a hose.

Establish a vehicle storage, maintenance and refueling area to minimize the spread of oil, gas and engine fluids. The use of oil pans under stationary vehicles will take place. Greenfield Farm will protect drainage inlets from receiving polluted storm water using filters such as fabrics, gravel bags or straw wattles, and so doing check on a regular basis the weather forecast and be prepared for rain by having necessary materials onsite before the rainy season.

9.12 PARAMETERS AND METHODS OF MONITORING

Greenfield Farm 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.

9.13 REVIEW

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

Section 10 Waste Management

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Accordingly, Greenfield Farms will implement the following Waste Management Plan.

10.1 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 Greenfield Farm. 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.

Greenfield Farm'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.

10.2 SOLID WASTE

OVERVIEW

Greenfield Farm's Solid Waste Management Plan (SWMP) is implemented from seed to storage to sale. In each stage of the business cycle Greenfield Farm 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 Greenfield Farm will seek to continuously improve efficiencies and reduce volume each year in business.

SCOPE

The Greenfield Farm Solid Waste Management Plan focuses on the following: The reduction of solid waste in accordance with 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:

WASTE TYPE	ANNUAL ESTIMATE	PEAK - DAILY ESTIMATE
Paper	365 LBS	1 LBS
Glass	182.5 LBS	½ LBS
Metal	40 LBS	0.11 LBS
Electronics	10 LBS	0.28 LBS
Plastic	1 TON	5.48 LBS
Organics	300 LBS	0.82 LBS
Inerts	250 LBS	0.68 LBS
Household hazardous waste	100 LBS	0.27 LBS
Special waste	10 LBS	0.28 LBS
Mixed residue	NONE	NONE

SOLID WASTE REDUCTION PLAN

Greenfield Farm 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)

Greenfield Farm 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

Greenfield Farm 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

Greenfield Farm 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, Greenfield Farm 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

Greenfield Farm will track and calculate, in tons, total waste leaving the property and waste diversion rate monthly. Sergey Yusupov, 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

Greenfield Farm 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

Sergey Yusupov, 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.

10.3 HAZARDOUS WASTE MANAGEMENT PLAN

OVERVIEW

Greenfield Farm's Hazardous Waste Management Plan (HWMP) is designed to identify and evaluate hazards associate with cannabis cultivation at Greenfield Farm. 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.

Greenfield Farm does not intend to use or produce any hazardous waste on site.

SCOPE

The Greenfield Farm 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 Sergey Yusupov, Director of Cultivation at Greenfield Farm.

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, Greenfield Farm 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 Greenfield Farm employees will be trained in the safe handling of potential biological hazards.

Chemical Hazards:

While Greenfield Farm 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 Greenfield Farm 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

Greenfield Farm 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 Greenfield Farm 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.

Greenfield Farm'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 Greenfield Farm 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 Sergey Yusupov 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 Greenfield Farm 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

Greenfield Farm 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.

10.4 CANNABIS VEGETATIVE MATERIAL WASTE MANAGEMENT PLAN OVERVIEW

Greenfield Farm'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.

Greenfield Farm'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 Greenfield Farm 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 two A-Type 3 cannabis crops will produce 380 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

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

PROCESSING, STORAGE AND DISPOSAL (BMPs)

Greenfield Farms shall recycle all vegetative wastes to birds and transport any solid wastes to the compost area. All leaves from pruning will also be given to our Donkeys to minimize cannabis vegetative waste. 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

Greenfield Farm 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

Greenfield Farm 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

Greenfield Farm'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, Sergey Yusupov, 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 Sergey Yusupov, Director of Cultivation of Greenfield Farm.

10.5 ESTIMATED MEDIUM USAGE

Projected 2020 Growing Medium: 5 Yards Projected 2021 Growing Medium: 5 Yards Projected 2022 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)

Greenfield Farm only uses organic inputs to amend soils, combat pests and grow healthy plants.

Our Added Amendments to Soil:

- Worm Castings (3-5 Gallons Per Yard)
- Organic Bat Guano (12% Nitrogen, 12% Phosphorus, and 2.5% Potassium)
- Organic Granular Kelp (1.0% Nitrogen, 15% Phosphorus, and 2% Potassium)
- Organic Humus Soil (3-5 Gallons per Yard)
- Organic Fish Powder (15% Nitrogen, 0.5% Phosphorus, and 0.5% Potassium)
- Fish Bone Meal (4% Nitrogen, 17% Phosphorus, and 0% Potassium)
- Shrimp Meal (6% Nitrogen, 6% Phosphorus and 0% Potassium)

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, Greenfield Farm 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, Sergey Yusupov. 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, Sergey Yusupov, 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.

Section 11 Water Resources

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Upon receiving this permit, Greenfield Farm will implement the following Water Resources Management Plan.

11.1 PURPOSE

Greenfield Farm'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.

Greenfield Farm'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.

11.2 SCOPE

The Greenfield Farm'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 Sergey Yusupov, Director of Cultivation.

11.3 OVERVIEW

Greenfield Farm is proposing to use one well for cultivation. The primary well was completed April 1980. The well will supply all the water for cultivation and purchasing water trucks will be used as backup or in any unforeseen emergency.

The main water source will be a groundwater well located on the subject parcel at 38.8420487812, -122.539622521. This well has an estimated yield of 40 GPM. The water will be pumped and stored in water tanks located near the cultivation site. From the well, water is delivered approximately 10 feet to a water tank collection system. Water is then pumped from the water tanks to the cultivation areas. When all proposed tanks are full a mechanical float switch shuts off system.

Water is delivered to irrigation system via a 1hp jet pump pressure tank system. Greenfield Farms shall use a drip irrigation system to water plants. Our projected monthly water usage is 80,000 gallons for cultivation. In addition to cultivation we shall use 30 gallons of water for livestock located on the parcel.

11.4 WATERSHED DESCRIPTION

Greenfield Farm is located in the Lower Sacramento River Watershed. The parcel is approximately 40.56 acres of forested land containing primarily black oak and blue oak, with a small conifer component consisting of several mature grey pines and ponderosa pines, with an understory of oaks and pines.

11.5 WATER CONSERVATION (BMPS)

Greenfield Farm 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.

11.6 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 gullyng. 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.

11.7 WETLAND/RIPARIAN PROTECTION AND MANAGEMENT

- Greenfield Farm 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.

- Greenfield Farm 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.

11.8 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. Greenfield Farm 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;
- Greenfield Farm will not dispose of domestic wastewater unless it meets applicable local agency requirements.

11.9 MONITORING PERFORMANCE AND MANAGEMENT

Greenfield Farm 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 1st 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 15th 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;

11.10 WRMP EVALUATION AND PERFORMANCE REPORTS

Based on the findings of the biannual monitoring inspections, Greenfield Farm 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 Central Valley Regional Water Quality Control Board (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.

11.11 REVIEW

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

11.12 COMPLIANCE

Greenfield Farm applied to the Regional State Water Board on September 2019. Greenfield Farm was granted a notice of receipt ok September 17th of 2019. The Cannabis General Order Application Number is 421543.

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

Section 12 Water Use

Greenfield Farm is applying for one Commercial Cannabis Cultivation Major Use Permit for two A-Type 3 in Lake County, California. Accordingly, Greenfield Farm proposes to implement the following Water Use Management Plan.

12.1 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.

Greenfield Farm'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.

12.2 SCOPE

The Greenfield Farm 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;

12.3 OVERVIEW

Greenfield Farm's well was permitted on April 17th, 1980. The well was completed on April of 1980. The well is sealed to the outside environment. Greenfield Farm's well is located approximately 178 feet south of the east outdoor cultivation. Greenfield Farm's has a solar well pump. The well has two existing 2,500 gallon storage tanks near well location. There are two 5,000 gallon water tanks at each proposed cultivation locations.

From the well, water is delivered approximately 178 feet to a water tank collection system at the location of the east outdoor cultivation area. From the well, water is also delivered approximately 778 feet to another water tank collection system at the location of the "lower" outdoor cultivation area. Water is then pumped to four separate tanks, stored directly outside each of the cultivation premises but within the cultivation site area. When all tanks are full, a mechanical float switch shuts off system.

Water is delivered to irrigation system via a jet pump pressure tank system. Greenfield Farm's shall use a drip

irrigation system to water plants. Our projected monthly water usage is 80,000 gallons for cultivation. In addition to cultivation we shall use 150 gallons for bathrooms and handwashing and an addition 30 gallons for watering animals.

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.”

12.4 WATER STORAGE (BMPS)

Greenfield Farm 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 10,000 gallons of water stored close to the cultivation site.

New storage tanks will be located in areas with great slope stability and at the cultivation site. To prevent rupture or overflow and runoff, Greenfield Farm 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.

12.5 IRRIGATION SYSTEM

Daily watering of cannabis will be achieved via a drip irrigation system powered by a 1HP jet pump and pressure tank system. 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 Greenfield Farm:

- 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;

12.6 MONITORING PERFORMANCE OF WATER

Greenfield Farm 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.

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

12.7 EVALUATING PERFORMANCE OF THE WATER USE MANAGEMENT PLAN

Annually, Greenfield Farm will review the Water Use Management Plan and recorded logs in conjunction with the reviews of all management plans. Upon review, Greenfield Farm 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.

12.8 CALIFORNIA DROUGHT DECLARATIONS

Greenfield Farm 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, Greenfield Farm will abide by all emergency regulations adopted in response to drought conditions.

12.9 EMERGENCY USE PLAN

In the case of an emergency that a retail water is needed, Greenfield Farm 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

12.10 WATER AVAILABILITY ANALYSIS

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.

Water Usage Calculation

Description	Use	Amount of water needed
Well Production	40 GPM	
Existing Usage (Agriculture / Live stock)	2 donkeys & 0.25 acres of fruit trees	95,000 Gallons per Season (5months)
Proposed Usage (Cannabis Cultivation)	2 acres of outdoor	800,000 Gallons per Season (5 Months)
	Difference	705,000 Gallons Per Season (5 Months)

12.11 REVIEW

Director of Cultivation, Sergey Yusupov 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. The well will be monitored during recharge or storage tanks and Greenfield Farm will meter and measure the amount of water pumped over cultivation season.

Appendix A: Fertilizer Information

Growers Choice Elite

Growers Choice Elite is for those who want it all. Built on the Growers Choice Premium, this recipe includes **perlite, coco coir, bat guano, kelp meal, green sand, glacial rock, and micorrhizae**. This perfect mixture guarantees you'll have a happy, healthy garden all year long.

Chemical Residue Screening



Sample Name: GC Elite
Client: coldcreekcompost
Sample Type: Other
Strain: Unknown

Submitted: March 15, 2019
Tested: March 15, 2019
Expires: March 15, 2020
Submitted for: Chemres,

Chemical Residue Screening - Pass

Targeted analysis of chemical residues. [SOP-017] | Date Performed: 2019-03-15

	ug/g	LOQ (ug/g)	LOD (ug/g)	Action Limit	Status		ug/g	LOQ (ug/g)	LOD (ug/g)	Action Limit	Status
Abamectin	< A.L.	0.02	0.01	0.30	Pass	Fludioxonil	< A.L.	0.01	0.01	30.00	Pass
Acephate	< A.L.	0.12	0.04	5.00	Pass	Hexythiazox	< A.L.	0.02	0.01	2.00	Pass
Acequinocyl	< A.L.	0.01	0.01	4.00	Pass	Imazalil	< A.L.	0.00	0.00	0.00	Pass
Acetamiprid	< A.L.	0.01	0.01	5.00	Pass	Imidacloprid	< A.L.	0.01	0.01	3.00	Pass
Aldicarb	< A.L.	0.02	0.01	0.00	Pass	Kresoxim-methyl	< A.L.	0.01	0.01	1.00	Pass
Azoxystrobin	< A.L.	0.01	0.01	40.00	Pass	Malathion	< A.L.	0.03	0.01	5.00	Pass
Bifenazate	< A.L.	0.01	0.01	5.00	Pass	Metalaxyl	< A.L.	0.00	0.00	15.00	Pass
Bifenthrin	< A.L.	0.07	0.02	0.50	Pass	Methiocarb	< A.L.	0.01	0.01	0.00	Pass
Boscalid	< A.L.	0.01	0.01	10.00	Pass	Methomyl	< A.L.	0.01	0.01	0.10	Pass
Captan	< A.L.	0.03	0.01	5.00	Pass	Mevinphos	< A.L.	0.01	0.01	0.00	Pass
Carbaryl	< A.L.	0.01	0.01	0.50	Pass	Myclobutanil	< A.L.	0.01	0.01	9.00	Pass
Carbofuran	< A.L.	0.01	0.01	0.00	Pass	Naled	< A.L.	0.02	0.01	0.50	Pass
Chlorantraniliprole	< A.L.	0.02	0.01	40.00	Pass	Oxamyl	< A.L.	0.02	0.01	0.20	Pass
Chlordane	< A.L.	0.05	0.02	0.00	Pass	Paclobutrazol	< A.L.	0.01	0.01	0.00	Pass
Chlorfenapyr	< A.L.	0.02	0.01	0.00	Pass	Parathion methyl	< A.L.	0.06	0.02	0.00	Pass
Chlorpyrifos	< A.L.	0.05	0.02	0.00	Pass	PCNB	< A.L.	0.02	0.01	0.20	Pass
Clofentezine	< A.L.	0.02	0.01	0.50	Pass	Permethrin	< A.L.	0.02	0.01	20.00	Pass
Coumaphos	< A.L.	0.02	0.01	0.00	Pass	Phosmet	< A.L.	0.01	0.01	0.20	Pass
Cyfluthrin	< A.L.	0.05	0.02	1.00	Pass	Piperonyl butoxide	< A.L.	0.01	0.01	8.00	Pass
Cypermethrin	< A.L.	0.04	0.01	1.00	Pass	Prallethrin	< A.L.	0.03	0.01	0.40	Pass
Daminozide	< A.L.	0.02	0.01	0.00	Pass	Propiconazole	< A.L.	0.01	0.01	20.00	Pass
Diazinon	< A.L.	0.01	0.01	0.20	Pass	Propoxure	< A.L.	0.01	0.01	0.00	Pass
Dichlorvos	< A.L.	0.01	0.01	0.00	Pass	Pyrethrin	< A.L.	0.04	0.01	1.00	Pass
Dimethoate	< A.L.	0.02	0.01	0.00	Pass	Pyridaben	< A.L.	0.00	0.00	15.00	Pass
Dimethomorph	< A.L.	0.01	0.01	20.00	Pass	Spinetoram	< A.L.	0.01	0.01	3.00	Pass
Ethoprophos	< A.L.	0.02	0.01	0.00	Pass	Spinosad	< A.L.	0.01	0.01	3.00	Pass
Etofenprox	< A.L.	0.01	0.01	0.00	Pass	Spiromesifen	< A.L.	0.03	0.01	12.00	Pass
Etoxazole	< A.L.	0.01	0.01	1.50	Pass	Spirotetramat	< A.L.	0.01	0.01	13.00	Pass
Fenhexamid	< A.L.	0.01	0.01	10.00	Pass	Spiroxamine	< A.L.	0.01	0.01	0.00	Pass
Fenoxycarb	< A.L.	0.01	0.01	0.00	Pass	Tebuconazole	< A.L.	0.03	0.01	2.00	Pass
Fenpyroximate	< A.L.	0.01	0.01	2.00	Pass	Thiacloprid	< A.L.	0.01	0.01	0.00	Pass
Fipronil	< A.L.	0.02	0.01	0.00	Pass	Thiamethoxam	< A.L.	0.01	0.01	4.50	Pass
Flonicamid	< A.L.	0.02	0.01	0.20	Pass	Trifloxystrobin	< A.L.	0.01	0.01	30.00	Pass

*ND = Not Detected
NT = Not Tested

Terpene Profiling -

Analysis of terpenes. [SOP-012] | Date Performed:

PPM	mg/g	LOQ (mg/g)	LOD (mg/g)	L.C. ²	Status	PPM	mg/g	LOQ (mg/g)	LOD (mg/g)	L.C. ²	Status
b-Myrcene	NT										
a-Bisabolol	NT					b-Caryophyllene	NT				
d3-Carene	NT					Isopulegol	NT				
d-Limonene	NT					Linalool	NT				
g-Terpinene	NT										
a- Pinene	NT					a-Caryophyllene	NT				
						guaiol	NT				
b- Pinene	NT										
Camphene	NT					Terpinolene	NT				
						a-Terpinene	NT				

Total Terpenes 0.0 PPM

*ND = Not Detected
²L.C. = Label Claim



This sample was tested by CW Analytical Laboratories. Results are valid through the expiration date indicated.
Robert W Martin, PhD
Robert W Martin, PhD

Appendix B: Lighting Information

Appendix C: Security Camera Information



HD Camera System with 8-Channel 4K DVR and Six 1080p HD Metal Outdoor Cameras, 150FT Night Vision

MPX86W



Appendix D: Additional Documents

ORIGINAL
File with DWR

STATE OF CALIFORNIA
THE RESOURCES AGENCY
DEPARTMENT OF WATER RESOURCES
WATER WELL DRILLERS REPORT

12N/06W-32M

Do not fill in

No. 084024

Notice of Intent No. _____

Local Permit No. or Date _____

AP 012-052-02

State Well No. _____

Other Well No. _____

(1) OWN

Address _____

City _____

(2) LOCATION OF WELL (See instructions):

County _____ Owner's Well Number _____

Well address if different from above 14722 SPRUCE GROVE RD

Township _____ Range _____ Section _____

Distance from cities, roads, railroads, fences, etc. 12N/06W-32

(12) WELL LOG: Total depth _____ ft. Depth of completed well _____ ft.

from ft. to ft. Formation (Describe by color, character, size or material)

0 - 40 red clay and embedded rock

40 - 80 fresh red rock

80 - 100 hard blue volcanics

100 - 150 intermixed fract. volcanics

150 - 190 fract. red volcanics

(3) TYPE OF WORK:

New Well ☒ Deepening ☐

Reconstruction ☐

Reconditioning ☐

Horizontal Well ☐

Destruction ☐ (Describe destruction materials and procedures in Item 12)

(4) PROPOSED USE:

Domestic ☒

Irrigation ☐

Industrial ☐

Test Well ☐

Stock ☐

Municipal ☐

Other ☐

WELL LOCATION SKETCH

(5) EQUIPMENT:

Rotary ☒ Reverse ☐ Yes ☒ No ☐ Size 3/8

Cable ☐ Air ☒ Diameter of bore 20

Other ☐ Bucket ☐ Racked from 20 to 190 ft.

(7) CASING INSTALLED:

Steel ☒ Plastic ☐ Concrete ☐ Type of perforation or size of screen

From ft.	To ft.	Dia. in.	Gage or Wall	From ft.	To ft.	Slot size
0	2	6 5/8	steel			
0	190	4	c160	150	190	1/8
			pvc			

(9) WELL SEAL:

Was surface sanitary seal provided? Yes ☒ No ☐ If yes, to depth 20 ft.

Were strata sealed against pollution? Yes ☒ No ☐ Interval _____ ft.

Method of sealing cement

(10) WATER LEVELS:

Depth of first water, if known _____ ft.

Standing level after well completion 50 ft.

(11) WELL TESTS:

Was well test made? Yes ☒ No ☐ If yes, by whom? driller

Type of test Pump ☐ Bailer ☒ Air lift ☐

Depth of water at start of test 50 ft. At end of test 160 ft.

Discharge 40 gal/min after 2 hours Water temperature _____

Chemical analysis made? Yes ☐ No ☒ If yes, by whom? _____

Was electric log made? Yes ☐ No ☐ If yes, attach copy to this report

WELL DRILLER'S STATEMENT:

This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

SIGNED LARRY HERMAN by kahhy read

(Well Driller)
NAME FISCH-HERMAN DRILLING CO.

(Person, firm, or corporation) (Typed or printed)
Address 5001 Gravenstein Hwy. N.

City Sebastopol, Calif. Zip 95472

License No. 304138 Date of this report 4-17-80

Central Valley Regional Water Quality Control Board

21 November 2019

WDID: 5S17CC421543

DISCHARGER

Sergey Yusupov
Green Field
4142 26th St. Ste. 2
San Francisco, CA 94131

LANDOWNER

Gelana Yusupov
154 S. Lake Merced Hill Dr.
San Francisco, CA 94132

**NOTICE OF APPLICABILITY, WATER QUALITY ORDER WQ-2019-0001-DWQ,
INSERT DISCHARGER NAME, APN 012-052-020-000, LAKE COUNTY**

Sergey Yusupov (hereafter "Discharger") submitted information through the State Water Resources Control Board's (State Water Board's) online portal on 17 September 2019, for discharges of waste associated with cannabis cultivation related activities. Based on the information provided, the Discharger self-certifies the cannabis cultivation activities are consistent with the requirements of the State Water Board *Cannabis Cultivation Policy- Principles and Guidelines for Cannabis Cultivation (Policy)*, and the *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities*, Order No. WQ-2019-0001-DWQ (General Order). This letter provides notice that the Policy and General Order are applicable to the site as described below. You are hereby assigned waste discharge identification (WDID) number **5S17CC421543**.

The Discharger is responsible for all applicable requirements in the Policy, General Order, and this Notice of Applicability (NOA), including submittal of all required reports. The Discharger is the sole person with legal authority to, among other things, change information submitted to obtain regulatory coverage under the General Order; request changes to enrollment status, including risk designation; and terminate regulatory coverage. The Central Valley Regional Water Quality Control Board (Central Valley Water Board) will hold the Discharger liable for any noncompliance with the Policy, General Order, and this NOA, including non-payment of annual fees.

Pursuant to the General Order and Policy, Gelana Yusupov (hereafter "Landowner") is ultimately responsible for any water quality degradation that occurs on or emanates from the property and for unauthorized water diversions. Accordingly, the Landowner, in addition to the Discharger, may be held responsible for correcting non-compliance.

1. FACILITY AND DISCHARGE DESCRIPTION

The information submitted by the Discharger states the disturbed area is equal to or greater than 1 acre (43,560 square feet), no portion of the disturbed area is within the setback requirements, no portion of the disturbed area is located on a slope greater than 30 percent, and the cannabis cultivation area is greater than 1 acre.

Based on the information submitted by the Discharger, the cannabis cultivation activities are classified as Tier 2, low risk.

2. SITE-SPECIFIC REQUIREMENTS

The Policy and General Order are available on the Internet at <http://www.waterboards.ca.gov/cannabis>. The Discharger shall ensure that all site operating personnel know, understand, and comply with the requirements contained in the Policy, General Order, this NOA, and the Monitoring and Reporting Program (MRP, Attachment B of the General Order). Note that the General Order contains standard provisions, general requirements, and prohibitions that apply to all cannabis cultivation activities.

The application requires the Discharger to self-certify that all applicable Best Practicable Treatment or Control (BPTC) measures are being implemented, or will be implemented by the onset of the winter period (November 15 - April 1), following the enrollment date.

3. TECHNICAL REPORT REQUIREMENTS

The following technical report(s) shall be submitted by the Discharger as described below:

1. A *Site Management Plan* must be submitted by **16 December 2019**. For more information on the requirements to submit a *Site Management Plan*, see General Order Provision C.1.a, and Attachment A, Section 5. Attachment D of the General Order provides guidance on the contents of a *Site Management Plan*. Dischargers that cannot implement all applicable BPTC measures by the onset of the winter period, following their enrollment date, shall submit to the appropriate Central Valley Water Board a *Site Management Plan* that includes a time schedule and scope of work for use by the Central Valley Water Board in developing a compliance schedule as described in Attachment A of the General Order. You are not required to use a Qualified Professional for developing the *Site Management Plan*. However, you are required to submit the Site Management Plan to Central Valley Water Board staff for approval prior to any site development.
2. A *Nitrogen Management Plan* must be submitted by **16 December 2019**, consistent with the requirements of General Order Provision C.1.d., and Attachment A, Section 5. Attachment D of the General Order provides guidance on the contents of the *Nitrogen Management Plan*.

3. A *Site Closure Report* must be submitted 90 days prior to permanently ending cannabis cultivation activities and seeking to rescind coverage under the Conditional Waiver. The *Site Closure Report* must be consistent with the requirements of General Order Provision C.1.e., and Attachment A, Section 5. Attachment D of the General Order provides guidance on the contents of the *Site Closure Report*.

4. MONITORING AND REPORTING PROGRAM

The Discharger shall comply with the Monitoring and Reporting Program (MRP). Attachment B of the General Order provides guidance on the contents for the annual reporting requirement. Annual reports shall be submitted to the Central Valley Water Board by March 1 following the year being monitored. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Central Valley Water Board's Executive Officer or the State Water Board's Chief Deputy Director, or Deputy Director.

5. ANNUAL FEE

According to the information submitted, the discharge is classified as Tier 2, low risk with the current annual fee assessed at \$1,000. The fee is due and payable on an annual basis until coverage under this General Order is formally rescinded. To rescind coverage, the Discharger must submit a Notice of Termination, including a *Site Closure Report* at least 90 days prior to termination of activities and include a final MRP report.

6. TERMINATION OF COVERAGE UNDER THE GENERAL ORDER & REGIONAL WATER BOARD CONTACT INFORMATION

Cannabis cultivators that propose to terminate coverage under the Conditional Waiver or General Order must submit a Notice of Termination (NOT). The NOT must include a *Site Closure Report* (see Technical Report Requirements above), and Dischargers enrolled under the General Order must also submit a final monitoring report. The Central Valley Water Board reserves the right to inspect the site before approving a NOT. Attachment C includes the NOT form and Attachment D of the General Order provides guidance on the contents of the *Site Closure Report*.

If the Discharger cannot comply with the General Order, or will be unable to implement an applicable BPTC measure contained in Attachment A by the onset of the winter period each year, the Discharger shall notify Central Valley Water Board staff by telephone at 530-224-4845 so that a site-specific compliance schedule can be developed.

All monitoring reports, submittals, discharge notifications, and questions regarding compliance and enforcement should be directed to centralvalleyredding@waterboards.ca.gov or 530-224-4845.



(for) Patrick Pulupa
Executive Officer

JF: ch

cc via email: Kevin Porzio, State Water Resources Control Board, Sacramento
Mark Roberts, Lake County Planning Department, Lakeport
Alexander Yusopov, Site Representative, Lower Lake