OPERATIONS PLAN

Prepared by:

AG HARVEST, INC.
6135 Huasna Townsite Road
Arroyo Grande, CA 93420

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1.0 INTRODUCTION

AG Harvest, Inc (AGH) has prepared this Operations Plan for outdoor cannabis cultivation located at 6135 Huasna Townsite Road, Arroyo Grande, California 93420 (Project Site). Cultivation activities will include cannabis cultivation and cannabis processing as an ancillary use, which includes drying, curing, trimming, storage, and nonmanufactured cannabis products including pre-rolled joints and making kief using a mesh screen (non-mechanical).

The Operations Plan discusses facility design and activities associated with the outdoor cultivation. Also included and attached to this document are the Site Plans, Security Plan, Odor Management Plan, Waste Management Plan, Cultivation Plan, and Inventory Management Plan.

1.1 REGULATORY COMPLIANCE

The Operations Plan is intended to comply with the following agency permit requirements and regulations:

- County of San Luis Obispo (County) Land Use Ordinance - Title 22 of the County Code, Section 22.040.

- California Department of Food and Agriculture (CDFA) – Medium Outdoor. California Code of Regulations, Title 3, Division 8, Chapter 1.

Any changes to this Operations Plan will be submitted to the County, CDFA, and any other agencies with regulatory oversight.

2.0 ORGANIZATIONAL STRUCTURE

2.1 CONTACT INFORMATION

AG Harvest, Inc.
Anna Gabriel – Owner/ General Manager
6131 Huasna Townsite Road
Arroyo Grande, CA 93420
(805) 489-7489
huasnatownusa@gmail.com

2.2 RESPONSIBILITY OF MANAGER

AGH's Owner and General Manager or their authorized designee will be responsible for overseeing the daily activities. The General Manager may elect to authorize another person or persons to act on their behalf. General Managers are those individuals who, directly or indirectly, are engaged in the management or oversight of AGH's activities. Additionally, the General manager may elect to authorize another person or persons to act in the various management capacities as discussed below.

2.2.1 COMPLIANCE MANAGER

The Compliance Officer is responsible for regulatory compliance, reporting, agency notifications, and ensuring that inventory is tracked and traced according to this plan and state guidelines. In the event of a regulatory audit, the Compliance Officer will be responsible for providing agencies with requested documents.

2.2.2 SECURITY MANAGER.

The Security Manager is responsible for ensuring that security measures are up to date and systems are functioning properly. The Security Manager will be responsible for notifying state and local agencies of any security breaches.

2.2.3 INVENTORY CONTROL MANAGER

The Inventory Control Manager is responsible for ensuring inventory is entered into the California Cannabis Track and Trace (CCTT) Metrc system. The Inventory Control Manager will be responsible for coordinating and tracking the delivery of cannabis products. The Inventory Control Manager will also be responsible quality assurance, diversion prevention, and disposal of expired, deteriorated, or damaged cannabis products.

2.2.4 EMPLOYEE TRAINING MANAGER

The Employee Training Manager is responsible for ensuring that employees authorized to track and trace cannabis products using the CCTT Metrc system are trained per state guidelines. They will also be responsible for ensuring that employees are trained on their roles and responsibilities, compliance, security, and record keeping.

2.2.5 RECORD KEEPING MANAGER

The Record Keeping Manager is responsible for keeping records of compliance notifications and actions, inventory control and tracking, quality assurance, security breaches, employee training, financial records, and any other record logs required by the state and local agencies.

2.2.6 FACILITY LIAISON.

The Facility Liaison is responsible for correspondence with the public and responding to agency requests for inspections.

2.3 STAFFING

AGH proposes to have up to three full-time employees. There will be one General Manager and two employees responsible for taking care of the plants in the cultivation area. Additionally, there will be up to five seasonal employees to assist with trimming and packaging the harvested cannabis, including making nonmanufactured cannabis products (i.e. pre-rolled joints and kief). Seasonal employees will carpool to the Project Site. The General Manager will assign employees to work in designated areas regarding cultivation activities, processing, storage and administrative duties.

2.4 REQUIREMENTS FOR ALL EMPLOYEES

AGH employees will be 21 years of age or older. All employees will be required to go through an employment review process that includes being interviewed by the General Manager and providing employment references.

2.5 TRAINING

Once hired, employees will be required to go through training pertaining to their authorized job duties. AGH will develop training procedures as part of its quality assurance program. Training will follow federal, state, and local agency requirements and will include, but is not limited to, the following:

1. laws and regulations regarding adult use and medical use cannabis;
2. job specific procedures for cultivation, manufacturing, cannabis storage, packaging, labeling, and transportation;
3. inventory tracking;
4. security and emergency procedures;
5. personal protective equipment, as needed;
6. compliance;
7. record keeping; and
8. quality assurance and control.

Training requirements for the above-mentioned topics are discussed further below and in the associated attachments of this Operations Plan.

3.0 FACILITY OPERATIONS

3.1 HOURS OF OPERATION

Hours of operation will be from 7 a.m. to 8 p.m., Monday through Sunday, for all activities occurring onsite. All visitors entering and exiting the site will occur during the proposed hours of operation.

3.2 FACILITY LAYOUT

AGH proposes to operate an outdoor cultivation operation that includes areas for cultivation and processing. There will also be a restroom and storage area for fertilizers and pesticides. The layout of the Project Site can be seen in Attachment A – Site Plans. Cannabis activities, plants, and products will not be visible to the public at any time

3.2.1 CANNABIS CULTIVATION AREAS

Cannabis cultivation activities include one contiguous canopy area approximately 29, 232 square feet (sq. ft.) as shown on the Site Plans in Attachment A. Plants will be cultivated in potting soil placed into geo-textile fabric pots known as Smart Pots. AGH proposes to use 100-gallon pots but the size of the pot may vary depending on plant's needs. Plants will be placed in rows throughout the designated cultivation area to allow personnel access to the plants. Within the cultivation area is a 2,500-gallon fertigation tank, which is filled with water and plant nutrients to allow for plant fertilization. AGH proposes to water plants using drip irrigation.

3.2.2 PROCESSING TRAILERS

There will be two trailers used for processing the harvested cannabis. The processing trailers are approximately 320 sq. ft. each for a total of 640 sq. ft. Once plants are harvested, they will be taken to one of the trailers for drying, trimming, curing, storage, and packaging, as necessary. In addition, the processing trailers will be used for making nonmanufactured cannabis products including pre-rolled joints and kief.

3.2.3 COMPOST AREA

AGH will compost cannabis green waste material onsite in the designated cannabis composting area shown on the Site Plans in Attachment A. The composting area is approximately 1,200 sq. ft. Cannabis green waste includes leaves, stalks, stems, root balls, and cannabis flowers that have been compromised. All waste will be managed in accordance with County and CDFA requirements as discussed in Attachment C – Waste Management Plan.

3.2.4 SOIL COMPOST AREA

AGH will compost the soil after each growing season. Soil will be stockpiled in the soil compost area shown on the Site Plan in Attachment A. AGH will add fertilizer amendments to enhance the soil during the composting process. AGH will utilize straw waddles around the soil stockpile for erosion and sediment control.

3.2.5 FERTILIZER AND PESTICIDE STORAGE

AGH will use fertilizers and pesticides as necessary for cultivation. Fertilizers and pesticides will be stored in the barn shown on the Site Plans in Attachment A. The barn is approximately 1,600 sq. ft. Fertilizers

and pesticides will be stored separately inside locked cabinets. Fertilizers and pesticide management is discussed further in Attachment E – Cultivation Plan.

3.2.6 CANNABIS STORAGE

Cultivated cannabis and nonmanufactured cannabis products will be stored in one of the processing trailers shown on the Site Plans in Attachment A. Storage areas and cannabis inventory will be managed in accordance with CDFA requirements as discussed in Attachment F – Inventory Management Plan.

3.2.7 SITE ACCESS

Visitors and employees will enter and exit the Project Site through one of the driveway gates located at the front of the property. All visitors and employees will be required to sign in and out upon entry and exit. Visitor and employee access is discussed further in Attachment B – Security Plan

3.2.8 RESTROOMS

There is currently an existing restroom located at the Project Site. The restroom is approximately 96 sq. ft and is connected to a septic system. The restroom will have an accessible pathway and will be available to all employees and visitors.

3.2.9 SOLID WASTE STORAGE

Solid and recycling waste will be stored in receptacles located in the cultivation area. Solid and recycling waste will be emptied into trash bins provided by Waste Management on a weekly basis. Waste Management is currently contracted to pick up waste bins on a weekly basis. Cannabis waste will not be put into these waste bins. Waste management is discussed further below and in Attachment C – Waste Management Plan.

3.2.10 DOORS, ENTRY, AND EXIT

Entry, exit, and authorized access areas are discussed in Attachment B – Security Plan.

3.2.11 PARKING

AGH will have seven designated parking spaces located at the Project Site, which includes one van accessible parking space in compliance with the Americans with Disabilities Act. Parking is for AGH managers, employees, contractors, agency inspectors, and public visitors. Employees and seasonal workers used for harvesting and trimming will carpool to the Project Site to minimize the number of vehicles.

3.3 ENERGY AND WATER CONSERVATION

In order to minimize energy use, AGH will implement the following:

1. use energy efficient lighting fixtures for normal business operations;
2. use energy efficient mechanical equipment, such as air conditioning units.

In order to minimize water use, AGH will implement the following:

1. install water fixtures that minimize water consumption, such as low-flow toilets and sink aerators;
2. irrigate landscaped plants using drip irrigation;
3. irrigate cultivation areas using drip irrigation; and
4. develop procedures for inspecting and maintaining all irrigation equipment.

3.4 PROPERTY MAINTENANCE

AGH will keep the Project Site in a clean and safe condition by, at a minimum, performing all of the following tasks:

1. cleanup and dispose of all trash, litter, and debris at the end of each business day;
2. keep driveways, sidewalks, landscaping, and adjacent streets clear and clean of trash and debris;
3. provide lighting at the Project Site to ensure the safety of the public and the employees;
4. perform facility and equipment inspections and maintenance on a regularly scheduled basis; and
5. otherwise operate in a manner that does not create or result in any significant adverse impacts at the Project Site or its adjacent areas.

3.5 SECURITY, VIDEO SURVEILLANCE, AND ALARM SYSTEM

AGH will implement County and CDFA regulations regarding security procedures, video surveillance, and alarm systems. AGH has prepared a Security Plan to address security, video surveillance, and alarm system requirements. See Attachment B – Security Plan.

3.6 WASTE MANAGEMENT

AGH will comply with County and CDFA agency regulations regarding waste management. AGH has prepared a Waste Management Plan as part of this Operations Plan. See Attachment C – Waste Management Plan.

3.7 ODOR MANAGEMENT

AGH will comply with County and CDFA agency regulations regarding odor mitigation. AGH has prepared an Odor Management Plan as part of this Operations Plan. See Attachment D – Odor Management Plan.

3.8 CULTIVATION PLAN

AGH will comply with County and CDFA agency regulations regarding cultivation. AGH has prepared a Cultivation Plan as part of this Operations Plan. See Attachment E – Cultivation Plan

3.9 INVENTORY TRACKING

Inventory will be tracked electronically using software compatible with the CCTT Metrc system. AGH has prepared an Inventory Management Plan in compliance with County and CDFA agency regulations regarding inventory control and tracking. See Attachment F – Inventory Management Plan.

3.10 QUALITY ASSURANCE AND CONTROL

AGH will develop procedures as part of its operations to ensure compliance with federal, state, and local agency requirements; and to ensure that cannabis products produced by AGH exceed client expectations. Quality assurance and control will be addressed by developing procedures for the following:

1. plant inspection;
2. cannabis product handling and inspection;
3. equipment and facility inspection;
4. inventory tracking;
5. manufacturing processes;
6. transportation safety;
7. security;
8. laboratory sampling and testing;
9. packaging and labeling; and
10. employee training.

3.11 RECORD KEEPING

As part of the Operations Plan, and in compliance with state and local agency regulations, AGH will develop reporting forms that include, but are not limited to, the following:

1. financial records including, but not limited to, bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration (formally Board of Equalization) under Title 18 California Code of Regulations sections 1698 and 4901;
2. personnel records, including each employee's full name, social security or individual tax payer identification number, date employment begins, and date of termination of employment if applicable;
3. training records, including but not limited to the content of the training provided, and the names of the employees that received the training;
4. contracts with other licensees regarding commercial cannabis activity;
5. permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity;
6. security records, except for surveillance recordings which are required to be kept for 30 days per County regulations;
7. records relating to the composting or destruction of cannabis goods;
8. documentation for data or information entered into the track and trace system;
9. all other documents prepared or executed by AGH or their authorized designee in connection with cannabis activities;
10. facility and equipment maintenance; and

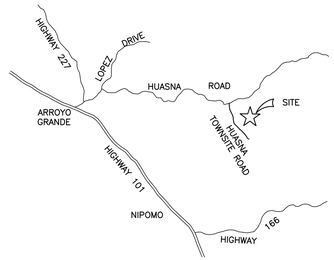
11. incident notification for security breaches and operational complaints (e.g. odor complaint).

AGH's records will be legible and stored in a location that is protected from debris, moisture, contamination, hazardous waste, fire, theft, and alteration by unauthorized persons.

AGH will keep all records for a minimum of seven years, or as required by the County and CDFA. Records will be available in either hard copy or electronic format for review by agency personnel upon request. Only the General Manager or their authorized designee will have access to records.

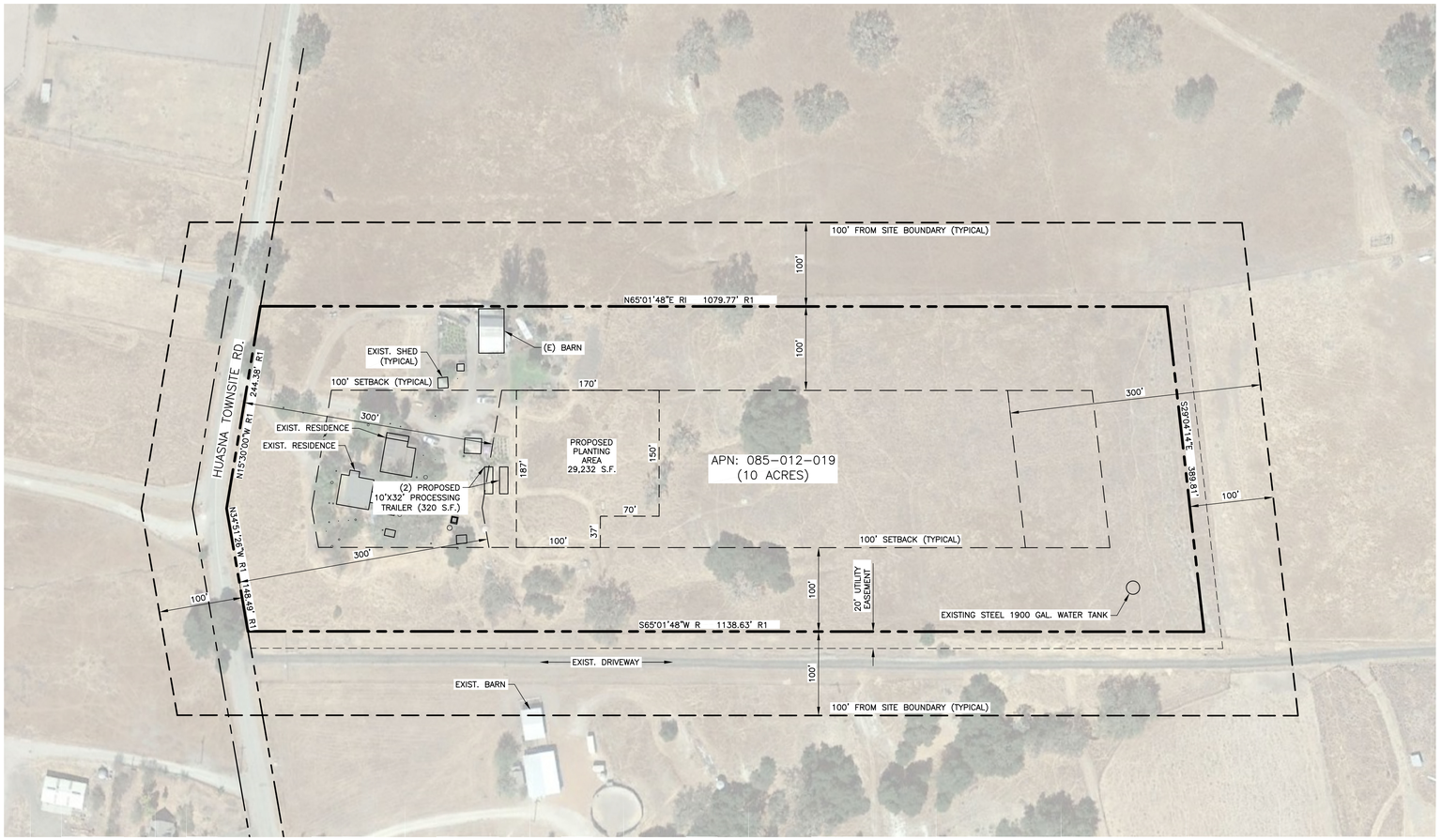
ATTACHMENT A – SITE PLANS

SHEET INDEX



VICINITY MAP

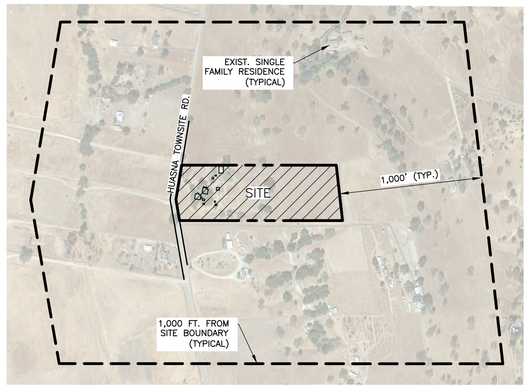
NO SCALE



SITE PLAN

0 40 80 160

SCALE: 1" = 80'



SITE 1,000 FT. PERIMETER

0 250 500

SCALE: 1" = 500'

PROJECT DATA

1.	PROJECT ADDRESS:	6135 HUASNA TOWNSITE RD. ARROYO GRANDE, CA 93420
2.	LOT SIZE:	435,095.8 SQ. FT. (10 AC)
3.	ASSESSOR'S PARCEL NO.:	085-012-019
4.	ZONING:	AG
5.	PROPOSED USE:	CANNABIS CULTIVATION, ANCILLARY PROCESSING
6.	WATER SUPPLY:	PRIVATE WELL
7.	SEWAGE DISPOSAL:	SEPTIC
8.	GAS:	SOUTHERN CALIFORNIA GAS CO.
9.	ELECTRICITY:	PACIFIC GAS & ELECTRIC
10.	TELEPHONE:	AT&T
11.	CABLE	CHARTER CABLE
12.	FEMA FLOOD ZONE:	ZONE X

PROJECT NOTES

1. TOPOGRAPHIC INFORMATION SHOWN ON THIS MAP IS BASED ON A SURVEY PERFORMED BY GARING TAYLOR & ASSOCIATES.

GARING, TAYLOR & ASSOCIATES, INC.
CIVIL ENGINEERS SURVEYORS PLANNERS
141 SOUTH ELM STREET · ARROYO GRANDE, CA 93420 · (805) 489-1321
RONALD G. REILLY

DATE

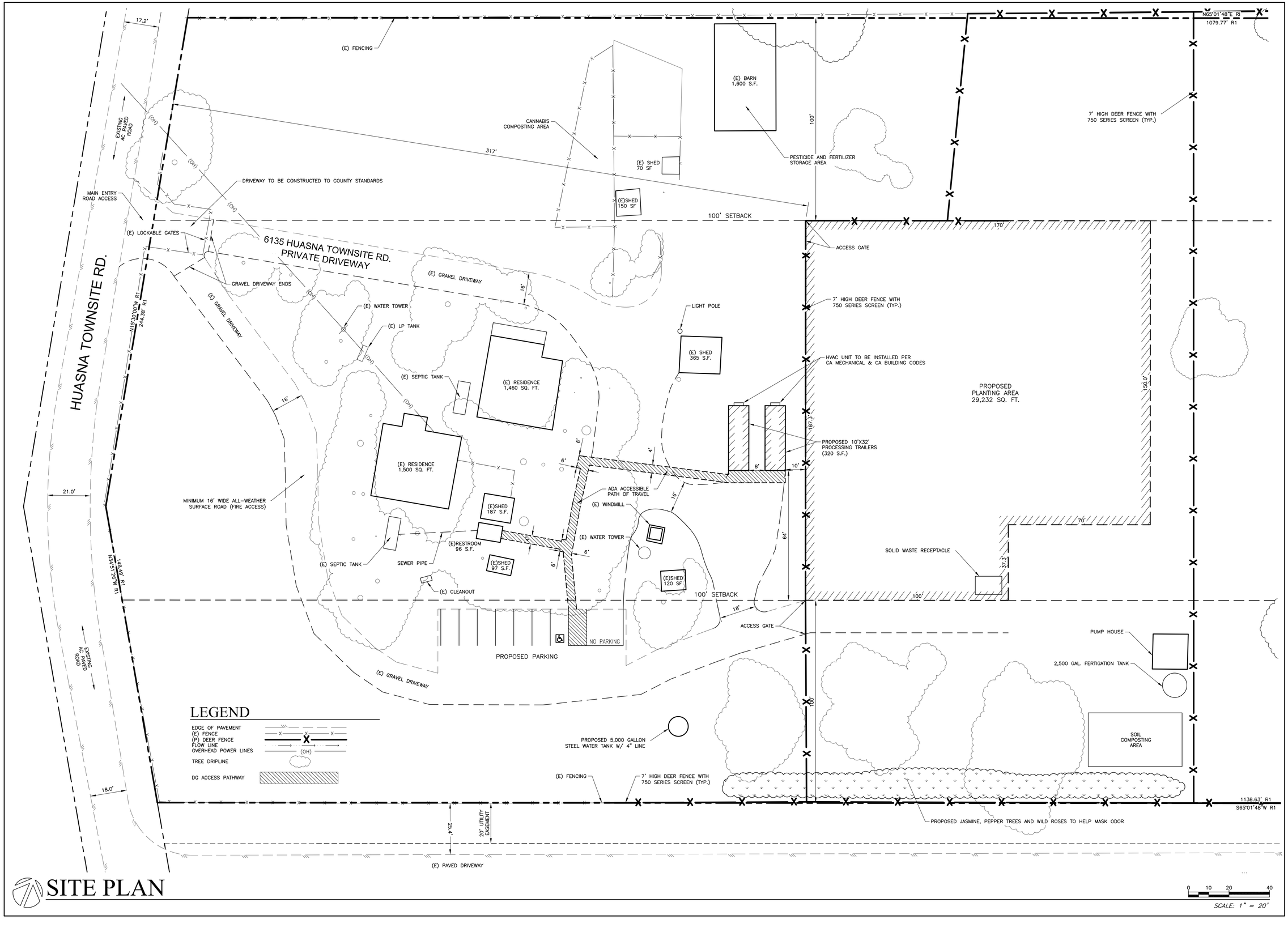
SHEET TITLE: SITE PLAN

PROJECT: RANCHO HUASNA
6135 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

CLIENT:
ANNA GABRIEL
6131 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

REVISIONS:

DRAWN BY: KJ
CHECKED BY:
DATE: 2018-11-08
JOB NO. 17-654
FILE NAME: SITE PLAN – OVERALL
SCALE: 1" = 20'
PLOT DATE:
SHEET: 1



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RONALD G. REILLY — DATE

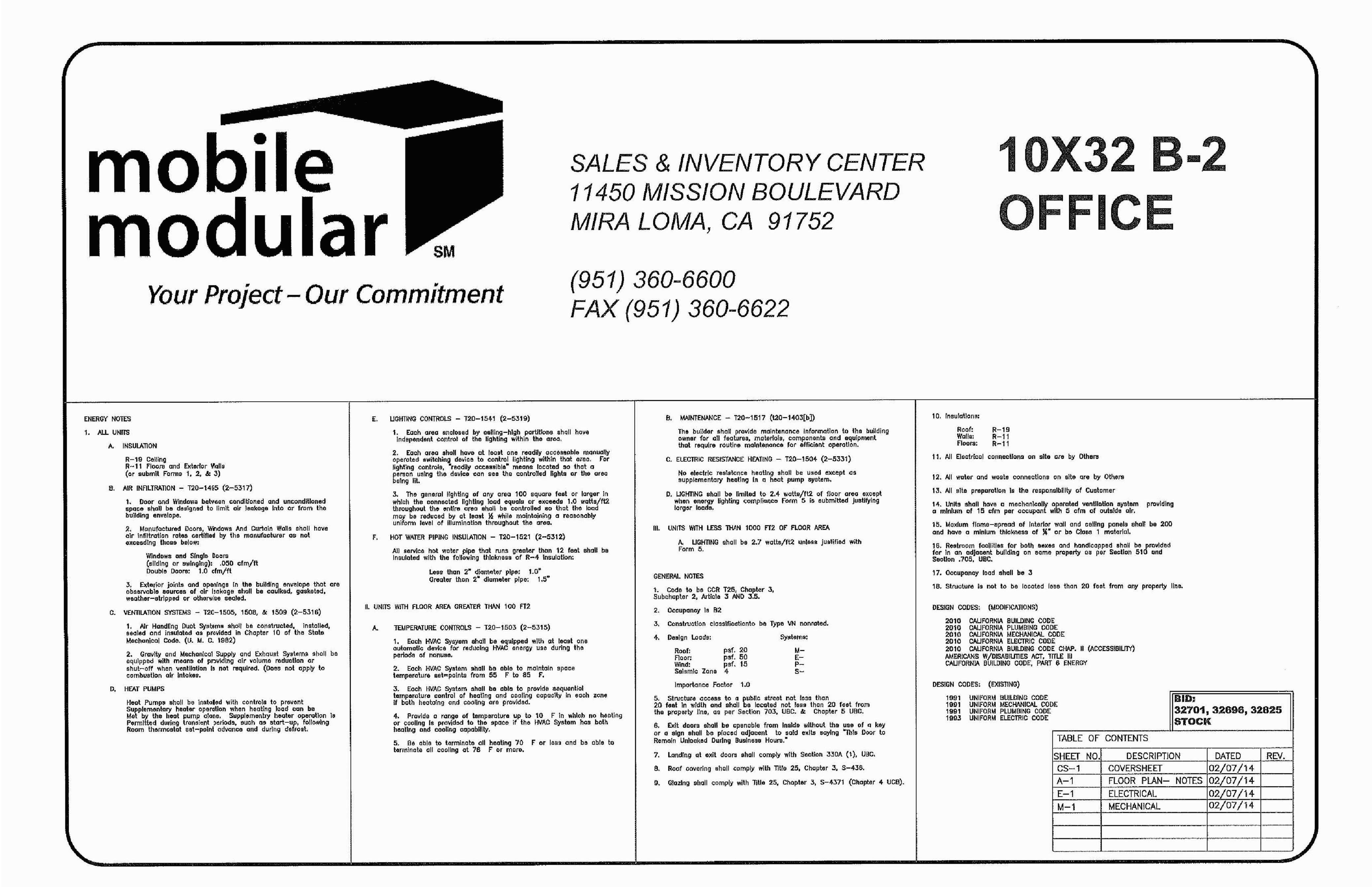
SHEET TITLE: SITE PLAN

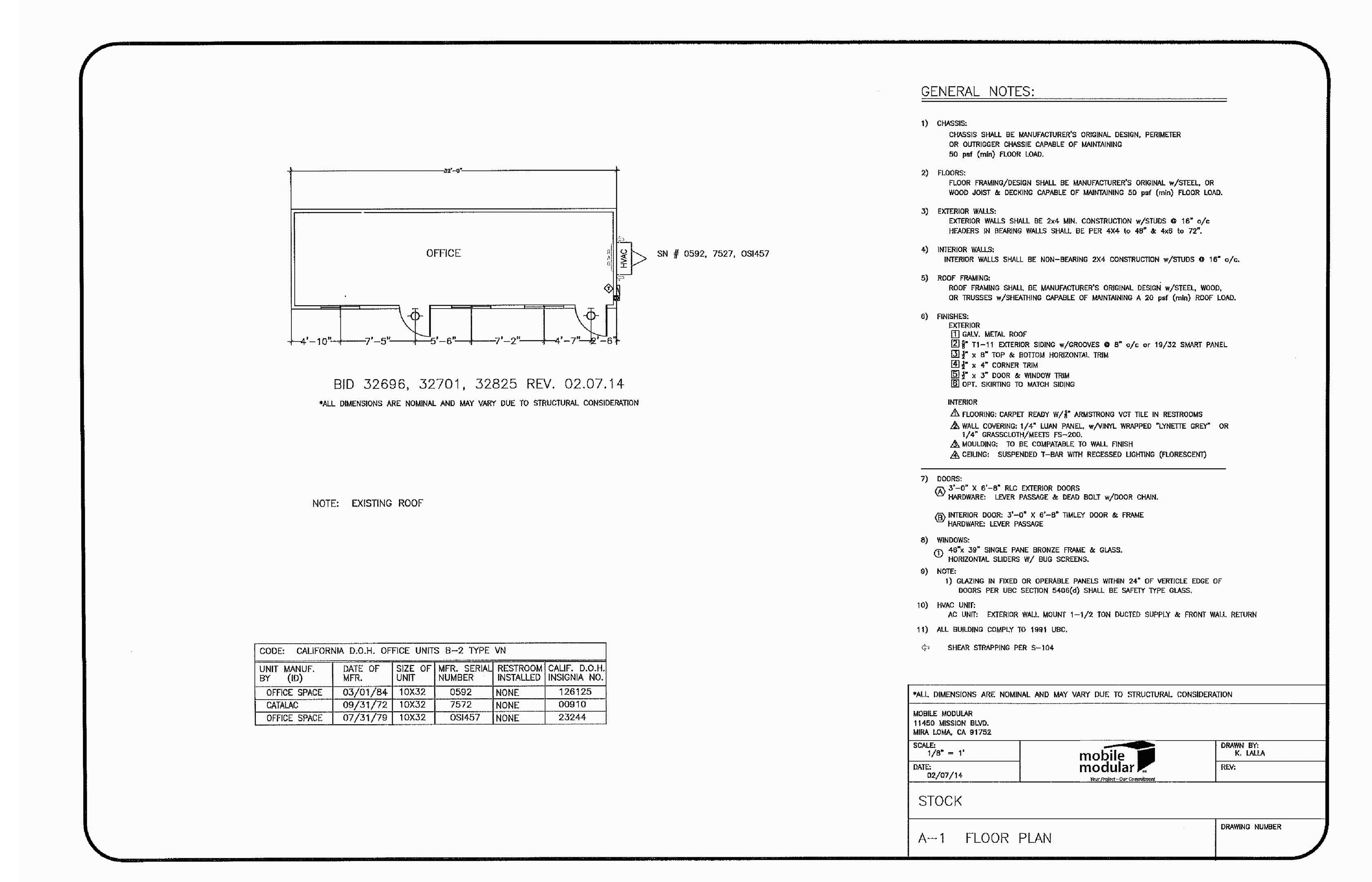
PROJECT: RANCHO HUASNA
6135 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

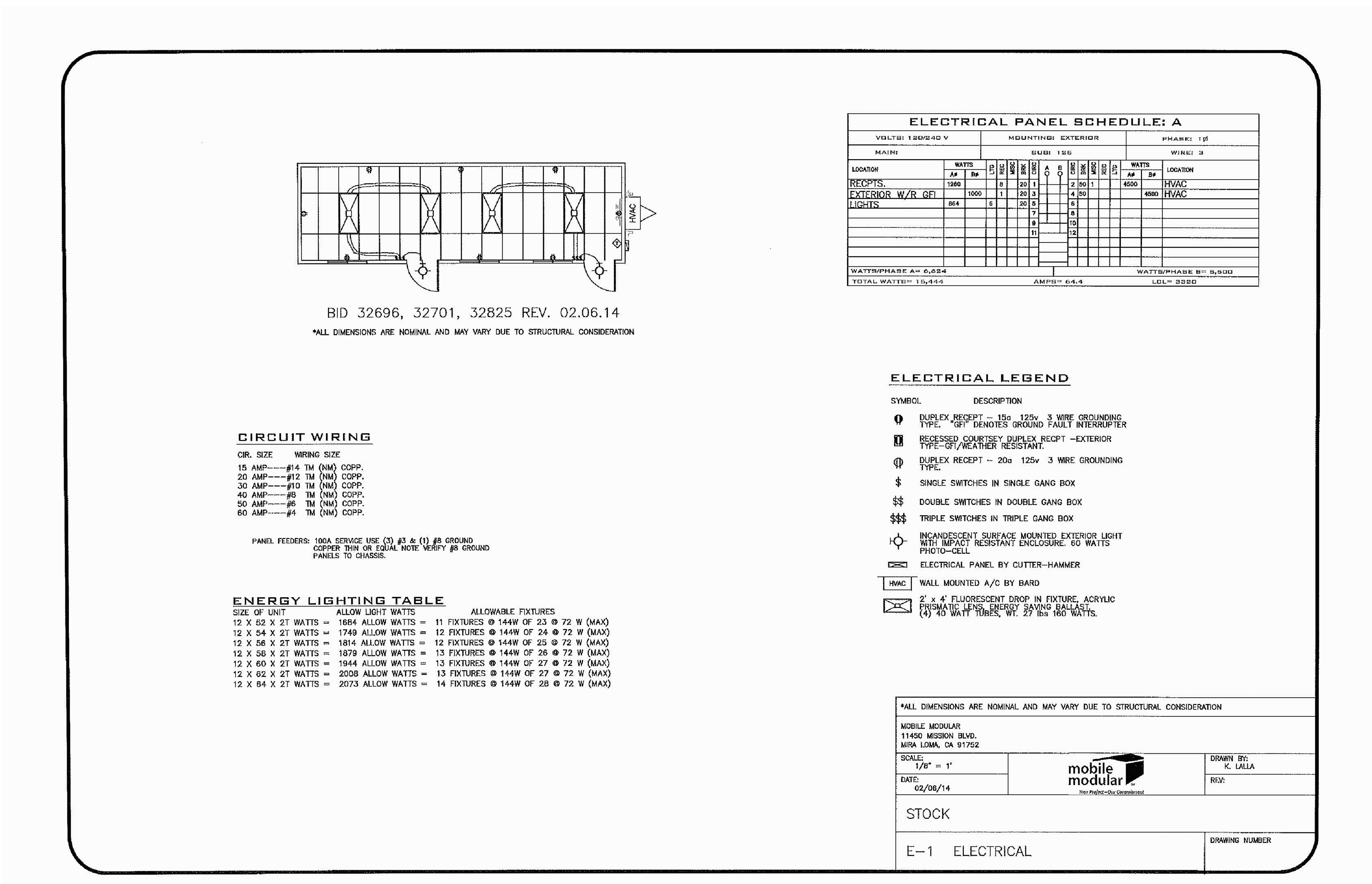
CLIENT:
ANNA GABRIEL
6131 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

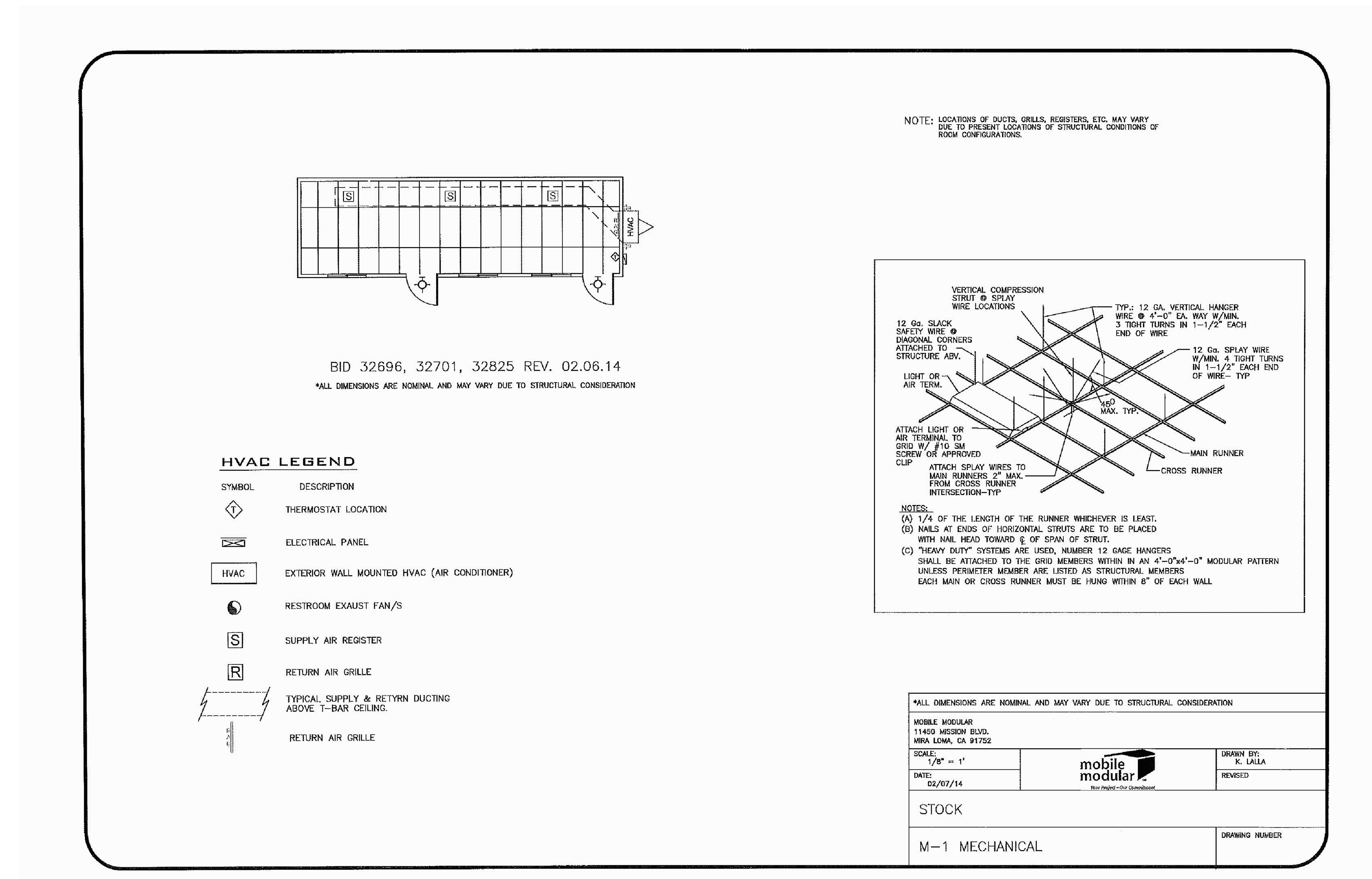
REVISIONS:

DRAWN BY:	KJ
CHECKED BY:	
DATE:	2019-01-16
JOB NO.	17-654
FILE NAME:	SITE PLAN – SHEET 2
SCALE:	1" = 20'
PLOT DATE:	2019-01-16
SHEET:	2









PROCESSING TRAILER DETAILS

GARING TAYLOR & ASSOCIATES, INC.
CIVIL ENGINEERS · SURVEYORS · PLANNERS
141 SOUTH ELM STREET · ARROYO GRANDE, CA 93420 · (805) 489-1321
RONALD G. REILLY
DATE

SHEET TITLE: PROCESSING TRAILER DETAILS

PROJECT: RANCHO HUASNA
6135 HUASNA TOWNSITE ROAD
ARROYO GRANDE, CA, 93420

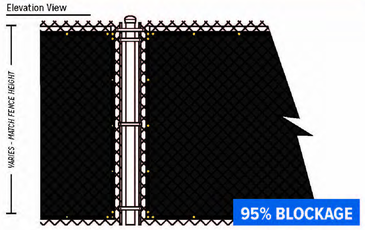
CLIENT: ANNA GABRIEL
6131 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

REVISIONS:

DRAWN BY: KJ
CHECKED BY:
DATE: 2018-11-30
JOB NO. 17-654
FILE NAME: PROCESSING TRAILER DETAILS - SHEET 4
SCALE: 1" = 20'
PLOT DATE: 2018-12-11
SHEET: 4

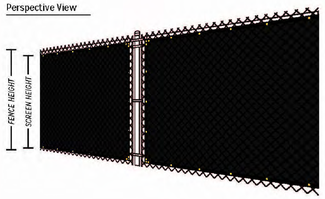
750 SERIES — COMMERCIAL BLOCK - CLOSED MESH POLY

Elevation View



- FENCESCREEN PANELS WITH 2" POLYPROPYLENE WEBBING FOR EDGE REINFORCEMENT.
- 3/8" BRASS GROMMETS AT 24" ON CENTER ATTACH TO FENCE WITH FENCESCREEN FASTENERS OR GALVANIZED HOG RINGS.

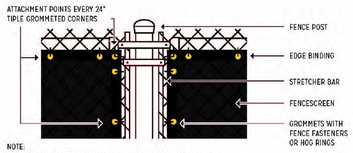
Perspective View



FENCESCREEN SPECIFICATIONS

PROPERTIES	RESULTS
Material / Fiber	100% Polypropylene
Material Weight	6 oz/yd²
Construction	30 x 16 weave with Hemo Closed Mesh
Grab Tensile Strength	420 x 256 lbs
Burst Strength	469 psi
Hems	3 ply reinforced with polypropylene binding
Shade Percentage	95%

Attachment Enlargement



NOTE:
- INSTALL PER FENCESCREEN MANUFACTURER RECOMMENDATIONS.
- REFER TO STRUCTURAL PLANS FOR ALL FOOTING SIZES.

Available Colors

Dark Green, Black.

Material Composition

Closed Mesh Windscreen is made from woven polypropylene with UV additives.

Drawings not to scale

Detail Name: 750 Series Commercial Block

Drawing Number: FSPS750

FenceScreen

PHONE: 1.888.313.6313 | www.FenceScreen.com

FenceScreen 750 Series Screen

- 5 YEAR LIMITED WARRANTY -

Verification of the warranty period and conditions requires a copy of the receipt or proof of purchase, as well as photos or returned product to determine cause of damage or failure. Warranty cannot be honored without proof of purchase and cause. Please retain these records.

5 YEAR

FenceScreen 750 Series Screen is warranted against manufacturer defects, such as improper molding, sizing, premature cracking or excessive color fade, which causes the product to become unserviceable due to color or strength loss from normal usage and exposure conditions, including sunlight and mildew. This warranty do es not cover the natural shift of color intensity with exposure to ultra-violet rays, inherent with all polymer materials. This warranty does not include labor costs associated with installing replacement FenceScreen 750 Series.

This warranty activated by faxing assigned copy of this form and your FenceScreen, Inc invoice within 45 days of purch ase to 949-269-0422.

This following will void the subject warranty: This warranty does not cover damage from improper care and cleaning, misuse, abuse, or improper installation which includes, but is not limited to, the following:

- Damage to the product caused by landscape or gardening equipment, corrosive or other chemicals, and/or high pressure or high mineral content water sprayers or sprinklers.
- Damage to the product due to, sand storms, constant salt water spray or immersion, pets, animals, vandalism, or other sources not related to the initial manufacturing.
- Damage due to high wind (1 minute average surface winds of 30 mph or greater lasting for 30 minutes or longer) or, damage due to winds gusting to 40 mph or g reater regardless of duration.
- Damage caused by plants (or vegetation of any sort) growing directly upon or in contact with any portion of the product, as well as sap from trees.
- Any alteration to the product itself, including any on-site cutting or taping and/or failure to follow any and all maintenance instructions.
- If the product is installed using non-FenceScreen parts and accessories, and/or improper placement of attachment accessories through this product, or anywhere other than through the designated attachment points.

FenceScreen 750 Series Screen is guaranteed for the same period of time against defects in workmanship or materials. FenceScreen, Inc. warrants to the original purchaser their redemption through a comparable replacement, repair, or issuance of a pro-rated credit toward the current purchase price of a new FenceScreen, Inc. replacement product. The choice of redemption method is solely at the discretion of FenceScreen, Inc.

It is the responsibility of the installer to attach fence windscreen panels so they will break away during windy conditions. FenceScreen 750 Series is to be installed with FenceScreen recommended attachment accessories only. For high wind areas, FenceScreen L-ties are recommended.

Notice of failure under the conditions of this warranty shall be sent to FenceScreen, Inc. or its authorized representative in writing, together with proof of purchase, and shall specify the nature of the defect, when it was first observed, as well as photographs of current site conditions. FenceScreen, Inc. may require returned product at its sole discretion to determine cause of failure. Any required shipment of returned product using an authorized FenceScreen, Inc. shipping service will be p aid by customer. Should the FenceScreen 750 Se ries Screen be improperly installed, FenceScreen, Inc. shall not be responsible for guaranteed performance or appearance of the material. Neither does this guarantee apply when failure or damage is due to improper use or application, abuse or misuse, vandalism, or acts of God. FenceScreen, Inc. reserves the right to inspect the material to determine the validity of any claim.

Upon acceptance of the claim by FenceScreen, Inc. or its authorized representative, redemption by replacement, renewal or issuance of a pro-rated credit shall be made by FenceScreen. Warranty is guaranteed to the original purchaser for a period of five (5) years from the original purchase date.

The above constitutes the complete warranty by the manufacturer. No other agreement, written or implied, is valid. FenceScreen, Inc. does not authorize any other person or agent to make any other express warranties. FenceScreen, Inc. neither assumes nor authorizes any other person or agent to assume any other liability in connection with FenceScreen 750 Series Screen. This warranty is non-transferable.

The above constitutes the complete warranty by FenceScreen, Inc. Contact FenceScreen, Inc. Customer Service at 1-888-313-6313 for additional information regarding terms or submission of this warranty.

FenceScreen

All warranties offered and backed by FenceScreen., Inc.

Date of Purchase: _____ *Purchaser's Name:* _____

DETAILS

GARING, TAYLOR & ASSOCIATES, INC.
CIVIL ENGINEERS SURVEYORS PLANNERS
141 SOUTH ELM STREET · ARROYO GRANDE, CA 93420 · (805) 489-1321
RONALD G. REILLY DATE

SHEET TITLE: DETAILS

PROJECT: RANCHO HUASNA
6135 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

CLIENT:
ANNA GABRIEL
6131 HUASNA TOWNSITE ROAD
ARROYO GRANDE CA, 93420

REVISIONS:

DRAWN BY:	KJ
CHECKED BY:	
DATE:	2018-11-30
JOB NO.	17-654
FILE NAME:	DETAILS – SHEET 5
SCALE:	1" = 20'
PLOT DATE:	2018-12-11
SHEET:	5

ATTACHMENT B – SECURITY PLAN

Removed for Confidentiality

ATTACHMENT C – WASTE MANAGEMENT PLAN

WASTE MANAGEMENT PLAN

Prepared by:

AG HARVEST, INC.
6135 Huasna Townsite Road
Arroyo Grande, CA 93420

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Page

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AG Harvest, Inc (AGH) has prepared this Waste Management Plan for outdoor cannabis cultivation located at 6135 Huasna Townsite Road, Arroyo Grande, California 93420 (Project Site). Cultivation activities will include cannabis cultivation and cannabis processing as an ancillary use, which includes drying, curing, trimming, storage, and nonmanufactured cannabis products including pre-rolled joints and making kief using a mesh screen (non-mechanical).

This Waste Management Plan was developed to identify potential waste streams, waste disposal, and procedures for managing wastes produced at the Project Site. Waste disposal will comply with all applicable federal, state, and local regulations.

In the event of any significant changes to this Waste Management Plan, AGH will notify and submit an updated version for review and approval to the San Luis Obispo County Planning and Building Department (County), California Department of Food and Agriculture (CDFA), and any local and state agencies with regulatory oversight.

2.0 WASTE MANAGEMENT

2.1 WASTE CLASSIFICATION

Waste streams will be managed by the type of waste and agency requirements. Wastes types associated with the facility include:

1. cannabis waste,
2. solid waste,
3. liquid waste, and
4. hazardous waste and universal waste.

2.2 CANNABIS DERIVED WASTE

AGH will cultivate cannabis plants in both the vegetative and flowering phases during the outdoor growing season which is typically June through November. AGH will harvest flowering plants once they reached maturity. During the growth process AGH will trim and prune the plants to ensure maximum plant health. During harvest AGH will dispose of stalks, stems, leaves, and parts of the cannabis plant that are considered waste.

Following harvest, the plants will be trimmed in the processing trailers. During this process there will be leaves and stems that are discarded. Cannabis leaves that can be used for pre-rolled joints will be stored for later use. Trichomes collected during the trim process will also be stored for later use.

Cannabis related waste associated with the activities described above include:

1. stalks and stems;
2. leaves and flowers;
3. post-process manufactured cannabis waste;
4. root balls and growing medium; and
5. any event resulting in exposure or compromise of cannabis products.

2.2.1 Cannabis Waste Disposal

Cannabis waste that includes stalks, stems, leaves, flowers, root balls, or any compromised cannabis material will be composted onsite in the designated compost area shown on the Site Plans in Attachment A of the associated Operations Plan. The compost area will only be accessible to authorized personnel.

All cannabis stalks, stems, leaves, flowers, or compromised cannabis material waste will be weighed prior to taking the waste to the composting area. Cannabis waste will be mixed with other organic materials, such as paper waste, non-cannabis green waste, cardboard waste, grease or other compostable oil waste, food waste, Bokashi or other compost activators, soil, or other compostable materials. Cannabis waste will be tracked and traced in accordance with CDFA requirements.

Growing medium will be not be disposed of and will be recycled and amended for reuse. Soil will be stockpiled in the soil stockpile area. AGH elects to integrate the composted material back into the soil.

In the event AGH chooses to use a licensed waste hauler for cannabis waste disposal, AGH will coordinate with the licensed waste hauler for pickup days and times. In addition, AGH will perform the following:

1. record the name of the entity hauling the waste;
2. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
3. track all cannabis waste in accordance with state track and trace requirements; and
4. keep records of cannabis waste disposal.

2.3 SOLID WASTE

Consistent with typical business operations, AGH will generate solid waste consisting of normal refuse, such as paper products, discarded packaging, plastics, building materials, food, broken equipment, and recyclable materials. Solid waste does not include cannabis waste.

2.3.1 Solid Waste Disposal

Products that can't be recycled will be discarded in trash receptacles designated for solid waste. Solid waste bins will be located in the cultivation area and processing trailers and will be emptied on a weekly basis, or as needed, into the receptacles provide by Waste Connections, a local licensed waste hauler. Solid waste will be picked up on a weekly basis by Waste Connections. AGH will coordinate with Waste Connections for the day and time of solid waste pickup.

Products such as paper, cardboard, plastics, bottles etc. will be recycled to the maximum extent feasible. Recycling bins will be located in the cultivation area and processing trailers and will be emptied on a weekly basis, or as needed, into the recycling receptacles provide by Waste Connections. Recycling waste will be picked up on a weekly basis by Waste Connections. AGH will coordinate with Waste Connections for the day and time of recycling pickup.

2.4 LIQUID WASTE

Liquid waste associated with the facility operations will include domestic waste and irrigation discharge. AGH proposes to minimize liquid waste by implementing the following:

1. install water fixtures that minimize water consumption, such as low-flow toilets and sink aerators;
2. irrigate cannabis plants using drip irrigation; and
3. follow manufacturer specifications for cleaning of equipment.

2.4.1 Domestic Liquid Waste

The Project Site is currently on a septic system. Domestic waste resulting from normal restroom use will be discharged into the septic system. AGH will not dispose of fertilizers, pesticides, or irrigation runoff into the septic system.

AGH will clean the facility as necessary. Equipment will be cleaned according to the manufacturer's recommendations, or as necessary. AGH will use cleaning products such as bleach bio-degradable cleaners and other cleaning products that are permitted by federal, state, and local agencies. Any domestic waste discharge to the septic system associated with cleaning activities will be minimized to the maximum amount feasible.

2.4.2 Irrigation Discharge

AGH will not discharge any hazardous chemicals or hazardous effluent. AGH will contact the Central Coast Regional Water Quality Control Board and apply for the required waste water discharge permits for cannabis cultivation. All proposed fertilizers and their constituents are listed and approved by the CDFA for use in cannabis cultivation.

2.5 HAZARDOUS AND UNIVERSAL WASTE

Universal waste is common waste that is considered hazardous but can be disposed at a licensed disposal facility. Universal wastes can include, but are not limited to, the following:

1. batteries,
2. compact fluorescent light bulbs;
3. nutrient fertilizers;
4. cleaning agents;
5. expired pesticides;
6. ink cartridges; and
7. electronic waste, such as computer monitors.

2.5.1 Hazardous and Universal Waste Disposal

AGH will store pesticides and fertilizers in locked cabinets within the designated shed as shown in the Site Plans in Attachment A of the associated Operations Plan. Cabinets will only be accessible to authorized personnel. Fertilizer or pesticide containers that have reached their expiration date or can no longer be used will be disposed of at a licensed disposal facility in compliance with federal and state regulations. AGH will coordinate with Waste Connections for pickup of hazardous waste or will self-haul hazardous waste to a licensed disposal facility.

Other universal wastes that are not fertilizers or pesticides will be separated in bins by type of waste to ensure incompatible wastes are not put together. AGH will coordinate with Waste Connections for pickup of universal waste or will self-haul the waste to a licensed disposal facility. Universal waste will be disposed of in compliance with federal and state regulations.

3.0 TRAINING

AGH will develop training and procedures to manage wastes appropriately, which can include, but is not limited to, the following:

1. designate authorized personnel to manage and track cannabis waste in compliance with state requirements discussed in Attachment F – Inventory Management Plan of the associated Operations Plan;
2. develop procedures and train employees on the storage and handling of pesticides, fertilizers, and waste products; and
3. train employees on fertigation procedures and water conservation practices.

All employees will be required to go through waste training during the hiring process and on an annual basis. Documentation of waste training will be kept as part of AGH's record keeping procedures.

4.0 RECORD KEEPING

AGH will maintain the following records:

1. weight of cannabis waste;
2. records relating to destruction of cannabis goods; and
3. employee training records.

Records will be kept for a period of seven years. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

ATTACHMENT D – ODOR MANAGEMENT PLAN

ODOR MANAGEMENT PLAN

Prepared by:

AG HARVEST, INC.
6135 Huasna Townsite Road
Arroyo Grande, CA 93420

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1.0 INTRODUCTION

AG Harvest, Inc (AGH) has prepared this Odor Management Plan for outdoor cannabis cultivation located at 6135 Huasna Townsite Road, Arroyo Grande, California 93420 (Project Site). Cultivation activities will include cannabis cultivation and cannabis processing as an ancillary use, which includes drying, curing, trimming, storage, and nonmanufactured cannabis products including pre-rolled joints and making kief using a mesh screen (non-mechanical).

The purpose of this Odor Management Plan is to identify potential cannabis related odor sources and mitigate the potential for odor detection outside of designated areas to the maximum extent feasible.

1.1 FACILITY CONTACT INFORMATION

In the event there is a complaint about odors, please contact AGH's Owner at the following:

AG Harvest, Inc.
Anna Gabriel – Owner
6131 Huasna Townsite Road
Arroyo Grande, CA 93420
(805) 489-7489
huasnatownusa@gmail.com

2.0 ODOR EMISSIONS

AGH has identified potential odor sources, the potential timing of odors, and mitigation measures to ensure odors are not detected outside of designated areas. Other than the outdoor cultivation area, odor emissions associated with cannabis will occur within the drying/ processing trailers.

2.1 ODOR SOURCES

AGH will operate an outdoor cannabis cultivation operation and processing as an ancillary use. As such, there is the potential to detect odors in and around the Project Site. Sources of odors are discussed below.

2.1.1 CANNABIS CULTIVATION AREAS

Odors from cannabis cultivation are the result of the plants in the flowering phase. Most cannabis plants flower for approximately six to nine weeks depending on the variety. Odors are typically present the last three to four weeks of the flowering period prior to harvest.

Plants in the vegetative phase and early flowering phase do not exhibit a "pungent" odor usually associated with cannabis.

2.1.2 HARVESTING AND DRYING

Cannabis plants are harvested once they reach their final maturation point, which is typically six to nine weeks after beginning the flowering phase. Harvested cannabis is then hung up on lines or racks inside a building to dry. Drying plants have the potential to create odors due to the ripening of the flowers.

2.1.3 TRIMMING AND CURING

Once dried, cannabis plants are ready to be trimmed. During the trimming process the cannabis is exposed to the environment and odors are typically present. Once plants are trimmed, and if the cannabis is not completely dry, it can be put into storage totes, bags, containers etc. to allow for the flowers to cure. During the curing process the container is opened and closed to allow for moisture to escape as the flowers ripen. During this process there is the potential to emit odors when the containers are opened.

2.1.4 PACKAGING

The trimmed and cured cannabis can be packaged prior to transport to a distributor. Packaging has the potential to emit odors because the cannabis is exposed to the environment.

2.1.5 PRE-ROLLS AND KIEF

The cannabis leaves (i.e. trim) and/ or flowers can be used to make pre-roll joints. During this process the trim and/or flowers are ground up and inserted into pre-rolled rolling papers. Once rolled, the joints are then packaged and stored in containers. During the grinding and rolling process there is potential for odors.

Additionally, during the trimming process the trimmers use trays that are lined with mesh screens that allow for trichomes, also known as kief, to pass through the mesh screen. The kief is then collected and stored in air-tight containers. This process is concurrent with trimming and has the potential to emit odors.

2.1.6 STORAGE AREAS

Cannabis flowers that have been processed will be stored in totes or containers. There is the potential to emit odors if the containers are opened.

2.2 TIMING OF ODOR SOURCES

Timing of odor sources is dependent on the timing of the activity as discussed below.

2.2.1 CANNABIS CULTIVATION

AGH will cultivate cannabis outdoor. The cultivation period typically starts in June and ends in November. During the months of June through August the cannabis plants are in the vegetative phase and do not exhibit odors associate with cannabis. The plants begin to flower in September and finish their cycle in late October or early November. During the last three to four weeks of flowering the plants produce an odor. The timing of this would be during October and early November as some plants take longer to mature and finish their flowering cycle. Once the plants have reached maturity they will be harvested. Once all the plants have been harvested there is no longer the potential of odors from cannabis cultivation.

2.2.2 HARVESTING AND DRYING

Plants that are harvested go immediately to one of the drying/ processing trailers shown on the Site Plans in Attachment A of the associated Operations Plan. It is estimated that harvest will take up to a month and will occur in phases as different cannabis strain reach maturity.

Drying of cannabis takes approximately 7-14 days depending on ambient air conditions such as temperature and humidity. Overall drying of the cannabis will take approximately one month as different strains are harvested at different intervals once they reach maturity.

Depending on market conditions, AG Harvest may transport the harvested cannabis to a distributor for drying, processing, or manufacturing.

2.2.3 TRIMMING AND CURING

Cannabis plants are trimmed once dried. Trimming will take place in the drying/ processing trailers. The amount of time it takes to trim is dependent on the amount of cannabis harvested and output production of trimmers. Typically, trimming will take one to two months. Plants that are dried but are not ready to be trimmed will be broken down and stored in totes or containers until ready for trimming.

Cannabis that has not fully dried or cured will be left in totes and the totes will be opened and closed to allow for the flowers to cure. The curing process typically takes about a week.

As stated previously, AG Harvest may transport the harvested cannabis to an offsite processor or distributor for trimming, curing, or distribution to a manufacturer. The timing of this is dependent on market conditions.

2.2.4 PACKAGING

Once trimmed and cured the cannabis flowers will be packaged in either bulk containers or individual packaging for transport to a distributor. Packaging of products will be concurrent with the trimming and curing process and will take approximately one to two months.

2.2.5 PRE-ROLLS AND KIEF

Cannabis leaves that are trimmed off the flower and are not considered cannabis waste will be collected and used for either pre-rolled joints or will be sold to a distributor for manufacturing. Pre-rolled joints will be subsequent to the timing of trimming and will occur on an as needed basis.

Kief is collected during the trimming process and the timing is concurrent with trimming, which is typically one to two months. Once collected, the kief will either be put in sealed containers, packaged for sale to a distributor, or stored for use in pre-rolled joints. Kief used in pre-roll joints will occur on an as needed basis.

2.2.6 STORAGE

Cannabis will be stored on a continual basis. Stored cannabis will be sent out to a distributor and timing is based on market demand.

3.0 ODOR MITIGATION

As stated above, there are potential cannabis related odors from cultivation, harvesting, drying, trimming, packaging, processing pre-rolled joints and kief, and storage. The processes are different but the engineering and administrative control for mitigating potential odors will be the same and are discussed below.

3.1 ENGINEERING CONTROLS

AGH will use best control technology to ensure odors are not detectable outside the Project Site boundaries or in common areas accessible to the public, such as the parking lot or walkways located outside of odor emitting areas.

3.1.1 CULTIVATION AREA

To help achieve odor control in the cultivation area, AGH has located the cultivation site in an area that is setback more than 300 feet from the front and rear property lines. At this location the prevailing winds predominantly move from west to east during the summer months, and from north to south during the winter months. Winds moving from west to east casue odor to move uphill and away from the public road and neighboring residences.

Due to topographical and parcel boundary constraints the cultivation site is setback 100 feet from the side property lines. To help achieve odor mitigation AGH will plant perennial trees and shrubs such as pepper trees, jasmine, and wild roses along the southern property line because the prevailing winds move in this direction. These plants produce floral scents that help mask the cannabis odors naturally.

AGH proposes to plant cannabis strains that have different flowering periods. This will decrease the number of flowering plants reaching maturity at one time, and thereby will decrease the number of plants producing odors.

3.1.2 DRYING AND PROCESSING TRAILERS

Drying and processing trailers will be equipped with doors that are properly sealed and kept closed. Additionally, AGH proposes fans and carbon air filters in the drying/ processing trailers. Proposed locations of air filter equipment are shown in the Site Plans located in Attachment A of the associated Operations Plan. Carbon filters use activated carbon to neutralize odors and trap particulates as air passes through the filter. A fan is used to push or pull air through the filter. This air can recirculate in the room or be exhausted out depending on the needs. An example specifications sheet for a carbon filter and fan is shown in Appendix A – Example Specifications.

3.2 ADMINISTRATIVE CONTROLS

In addition to engineering control, AGH will implement the following administrative controls:

1. Ensure doors remain closed at all times except for entry and exit by authorized personnel.
2. Ensuring that authorized personnel work in their designated areas.
3. Establish procedures to inspect doors and odor control equipment (e.g. carbon air filters) and maintain and/or replace equipment according to the manufacturer's recommendations, or as needed.
4. Establish procedures to manage odor complaints and train employees on odor mitigation.

3.2.1 MANAGING ODOR COMPLAINTS

AGH will perform the following to manage potential odor complaints:

1. AGH will provide the General Manager's contact information to the County for any odor related complaints. At the County's request, the contact information of the General Manager will also be provided to neighboring businesses and residences in the event of an odor complaint.
2. AGH will have the General Manager or authorized designee onsite during operational hours to ensure odor complaints can be answered and managed accordingly.
3. All odor complaints will be addressed within 24 hours of receiving the complaint.
4. The General Manager or authorized designee will identify the location of where the odor is causing a nuisance.
5. For drying/ processing trailers, the General Manager or authorized designee will inspect all doors and areas where there is potential for odor-emitting activities and will ensure these areas are properly isolated. If it is found that isolation is not performed correctly, the General Manager will investigate the reason and do one of the following:
    a. Talk with staff about the need to keep doors closed for odor-emitting areas. If necessary, retrain staff on administrative odor controls discussed herein.
    b. Contact a licensed contractor to fix broken doors or seals.
6. The General Manager or authorized designee will also inspect engineering controls to ensure they are functioning properly. This will include, but is not limited to, the following:
    a. ensure pepper trees, jasmine, and wild roses plants along the property lines are healthy and maintained;
    b. ensure equipment is turned on and working properly;
    c. inspect equipment to ensure fans, filters, and ducting are attached correctly;
    d. inspect equipment maintenance logs to ensure filters have been replaced as required by manufacturer;
    e. replace broken fans or ducting that has been damaged.
7. All odor complaints will be documented, including:
    a. the person making the complaint;
    b. where the complaint occurred;

c. the date and time of the complaint;

d. the person that received the complaint;

e. the date and time the complaint was investigated;

f. engineering controls that were inspected and administrative controls that were assessed;

g. identification of engineering and/ or administrative controls that were identified as the cause of the odor;

h. actions taken to correct the problem, including the work performed, equipment needed, and any additional training; and

i. recommendations and actions taken to ensure the problem does not continue.

3.2.2 CONTINGENCY ODOR MANAGEMENT

In the event that odor nuisances continue after implementing the administrative and engineering controls discussed herein, AGH will perform one or more of the following:

1) Minimize operations that create odors.

2) Purchase additional filters and fans as backup in the event the equipment breaks, or replacement is necessary.

3) Add additional charcoal filters and fans or upgrade to a larger size filter and fan that can "scrub" more air in areas with odor-emitting activities.

4) Contract with a professional odor management specialist, such as Byer Scientific and Manufacturing, to assess and determine what additional measures and equipment can be added to ensure adequate odor mitigation is achieved.

Each one of the above-mentioned steps will be assessed and monitored to determine if the modifications are effective in mitigating odors. AGH will notify the County of any changes to equipment and procedures used to mitigate odors. Any changes will be added to AGH's inspection procedures and training processes.

4.0 TRAINING

Staff will be trained on procedures for mitigating odor, as discussed above. The General Manager or their designee will be responsible for training all new employees prior to beginning work in areas where there is potential for odor-emitting activities. Staff will be required to go through training on an annual basis to review odor mitigation procedures. AGH will keep records of training as part of its record keeping procedures discussed below.

5.0 RECORD KEEPING.

Records pertaining to this Odor Management Plan will include, but are not limited to, the following:

1. performed maintenance logs for mechanical and odor control equipment;
2. records of purchases for maintenance equipment (e.g. carbon filter replacement);
3. documentation and notification of equipment malfunctions;
4. documentation of odor complaints;
5. employee training logs; and
6. documentation for review and changes to engineering and administrative controls discussed in this Odor Management Plan.

Records will be kept for a period of seven years. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

APPENDIX A – EXAMPLE SPECIFICATIONS

CARBON AIR FILTER AND FAN

16" MAX-FAN™

CFM	2436 at 0wg
RPM	1680
Max Watts	347
Amps	1.5 @ 240v AC 60 Hz
Max Abient Temp.	80°C / 176°F
Diameter	16"
Length	16.375"
Blade Design	Mixed Flow
Housing	Aluminum
Inlet/Outlet	16"

Figure 1. The above depiction is an example of the type of fan that is used to push or pull air through a carbon air filter as shown in Figure 2 below.
(Can-Filters®. 2018. http://canfilters.com/?geoip_country=US)

MAX-FILTER 2500

Max Exhaust CFM: 1250 cfm / 2123 m³h @ 0.1 sec contact time
Max Recirculating (Scrubbing) CFM: 2500 cfm / 4247 m³h
Recommended Min Airflow: 625 cfm / 1147 m³h
Prefilter: Yes
Flange: 14" - 16"
Dimensions: (with pre-fi lter)

Outside Diameter: 50 cm/ 20"
Height: 100 cm / 39.4"

Total Weight: 47 kg / 103 lbs.
Carbon Weight: 37 kg / 81.5 lbs.
Carbon Bed Depth: 6.5 cm / 2.5"
Max Operating Temp: 80°C
Pressure drop at max CFM: 180pa / .75"wg

Figure 2. The above depiction is an example of a carbon filter that, when used in conjunction with a fan as shown in Figure 1 above, neutralizes odors.
(Can-Filters®. 2018. http://canfilters.com/?geoip_country=US)

ATTACHMENT E – CULTIVATION PLAN

CULTIVATION PLAN

Prepared by:

AG HARVEST, INC.
6135 Huasna Townsite Road
Arroyo Grande, CA 93420

TABLE OF CONTENTS

1.0 INTRODUCTION

AG Harvest, Inc. (AGH) has prepared this Cultivation Plan for outdoor cultivation activities located at 6135 Huasna Townsite Road, Arroyo Grande, California. (Project Site). This Cultivation Plan addresses cultivation equipment, operations, water use, waste management, and pesticide management and storage and disposal.

AGH will cultivate approximately 29,232 square feet (sq. ft.) of canopy space for flower production. All cannabis cultivation will occur outdoors. AGH will also process the cannabis cultivated onsite as an ancillary use. Processing will include drying, trimming, curing, storage, making pre-rolled joints, and collecting trichomes known as kief.

AGH is committed to designing a cultivation process that uses best-available control technology, is environmentally friendly, and produces the highest quality cannabis possible. The purpose of this Cultivation Plan is to demonstrate how AGH will comply with the San Luis Obispo County Planning and Building Department (County) and California Department of Food and Agriculture (CDFA) applicable laws and regulations pertaining to the proposed cultivation operation.

2.0 EQUIPMENT

AGH will use equipment that meets federal and state regulatory standards, industry best practices, and best-available control technology.

2.1 FERTIGATION AND GROW MEDIA

Fertigation equipment will be installed and operated in accordance with the manufacturer's guidelines and comply with federal, state, and local agency regulations. Fertigation equipment will include, but is not limited to, the following:

1. water storage tanks;
2. drip irrigation tubing;
3. fertilizers; and
4. sensors, gauges, pumps, and other ancillary equipment necessary to measure fertilizers and maintain pressure and flow for irrigation lines.

Plants will be grown in "Smart Pots" containing soil. Smart Pots are flexible and are made of a geo-textile fabric.

3.0 CULTIVATION OPERATIONS

AGH will have approximately 29,232 sq. ft. of canopy under cultivation. Plants will begin in the vegetative phase and then flower once the outside photoperiod changes due to sunlight conditions. All plants used for cultivation will be purchased from a licensed nursery and distributor.

3.1 VEGETATIVE GROWTH

Plants in the vegetative phase will receive approximately 14-15 hours of light and 10-9 hours of darkness initially. Once sunlight conditions reach about 12-13 hours of light the plants will begin the flowering phase.

3.2 FLOWERING PHASE

Plants are in the flowering phase for approximately 6-9 weeks depending on the strain of cannabis cultivated. Some strains can take up to 10 weeks to finish their flowering cycle. During the flowering phase plants will receive approximately 12 hours of sunlight and 12 hours of darkness. Flowering plants will be harvested once they reach their maturation point.

3.3 TOPPING

Topping involves locating the top of the plant and cutting the main stem just below the newest growth, making it a "headless" plant. The new branch will then form a "Y" shape, allowing for two new stems to grow. Whenever you cut one stem, the smaller leaves below the cut area begin to grow out new branches. If you cut one stem, it will turn it into two stems; cut those two stems, they will turn into four, and so on. Additionally, topping the plant sends hormones throughout the plant that signals the plant to branch out and grow more tops, which increases a plant's yield capacity

The plant matter produced from topping will be disposed of in accordance with the Waste Management section discussed herein.

3.4 PRUNING

Pruning is a process that is required on a regular basis to maintain healthy plants. The lower region of the plant will be pruned of all leaves and smaller branches, which in turn promotes upward growth. This allows the plant to utilize its resources and energy toward growing its upper portion, or the area that is more likely to produce healthy clones.

The pruned plant matter will be disposed of in accordance with the Waste Management section discussed herein.

3.5 FERTIGATION

Fertigation activities include the mixing of water and fertilizers and delivering the mixture to the plants. This mix is then distributed to cultivated plants using pumps, irrigation lines, and drip nozzles. This process allows for precise control over the amount of nutrients and water used to irrigate plants and minimizes waste water.

3.6 EQUIPMENT CLEANING AND MAINTENANCE

AGH will need to clean equipment and cultivation areas in order to maintain a clean, healthy, and contaminant-free environment. Cleaning agents can include, but are not limited to, biodegradable soaps, citric acid, hydrogen peroxide, or other chemicals approved by federal and state regulations.

All equipment used will be cleaned and maintained in compliance with the manufacturer's recommendations, or as needed. Employees responsible for inspecting and cleaning equipment will be trained prior to working in the cultivation area.

AGH will maintain facility and equipment maintenance logs as part of its quality assurance program. AGH will contract with qualified persons for maintenance requiring a licensed professional. Inspection records will be kept as part of the AGH's record keeping process discussed herein.

3.7 FERTILIZER STORAGE

Fertilizers will be stored in the barn shown on the Site Plan in Attachment A of the associated Operations Plan. Fertilizers will be properly labeled and stored in compliance with the manufacturer's guidelines. Only authorized personnel have access to fertilizers.

4.0 PESTICIDE MANAGEMENT

AGH will not use pesticides, insecticides, herbicides, fungicides, and rodenticides (collectively referred to as "pesticides") prohibited by federal, state, or local agency regulations, or in a manner that is inconsistent with the manufacturer's recommendations.

Pesticides will be applied to control pests and plant disease, as necessary. AGH will use pesticides with ingredients that are approved by the CDFA as being exempt from residual tolerance requirements, and either exempt from registration requirements or registered for a use that's broad enough to include use on cannabis.

4.1 ROLES, RESPONSIBILITIES, AND TRAINING

The following will be performed for employees responsible for pesticide application:

1. AGH will designate employees to apply pesticides in accordance with the manufacturer's labeling.
2. AGH will ensure that designated employees are trained on the handling, use, and application rate of all pesticides used for cultivation at the Project Site.
3. AGH will supply personal protective equipment (PPE) and ensure that designated employees follow PPE requirements as determined by the manufacturer's PPE requirements.
4. Employees will be trained on proper PPE use as required by the manufacturer.
5. Employees will be trained on safety and documentation procedures for pesticide application.
6. Training and pesticide application records will be kept as part of the AGH's record keeping process.

4.2 INTEGRATED PEST MANAGEMENT

4.2.1 CULTURAL PEST-MANAGEMENT CONTROL METHODS

AGH will develop procedures to ensure employees use proper PPE and maintain good hygiene while working in cultivation areas. Cultivation areas will be kept free of debris to minimize exposure to pests, bacteria, and fungus.

4.2.2 BIOLOGICAL PEST-MANAGEMENT CONTROL METHODS

AGH will use biological controls, such as predatory insects as part of its IPM. Examples of predatory insects include predatory nematodes, predatory aphids, predatory mites, lacewigs, or ladybugs. AGH will also use beneficial bacteria and fungus that aid plant health and help control harmful plant disease and pests.

4.2.3 CHEMICAL PEST-MANAGEMENT CONTROL METHODS

AGH will use chemical pest control methods as part of its IPM. All proposed chemical ingredients are listed by the CDFA as allowed for use on cannabis. Chemical pesticides will be applied either through nozzle sprayers, foggers, drip irrigation (i.e. chemigation), or other application means in accordance with the manufacturer's guidelines. Chemical products and their active ingredients can be found on the following page in Table 1 – Chemical Pest Controls.

Table 1. Chemical Pest Controls. AGH will submit any changes to this list of pesticides in writing to the CDFA and local agencies for review and approval.

Manufacturer	Common Name	Active Ingredient
Marrone Bio Innovations	Regalia	Extract of Reynoutria Sachalinensis
Bayer	Serenade	QT 713 strain of Bacillus Subtilis
Valent	Pyganic EC 5.0	Pyrethrins
Marrone Bio Innovations	Grandevo	Chromobacterium Subtsugae PRAA4-1
Marrone Bio Innovations	Venerate	Burkholderia spp. strain A396
Bionide	Sulphur/ wettable Sulfur	Sulfur
Pathogen Zero	Pathogen Zero	Citric Acid
Amazing Dr. Zymes	Dr. Zymes Eliminator	Citric Acid
Bioworks	Botanigard 22WP	Beuveria Bassiana
Blacksmith Science	Armory	Beneficial Bacillus Blend
Monterey	Monterey B.T.	Bacillus Thuringiensis
BioSafe Systems	Zerotol 2.0	Hydrogen Dioxide, Peroxyacetic Acid
Wondercide	Outdoor Pest Control	90 % Cedar Oil
Food Grade	Food Grade Hydrogen Peroxide 32%	Hydrogen peroxide
Greenspire Global Inc.	Proacidic 2	Citric Acid

4.3 PESTICIDE STORAGE

Pesticides will be stored the barn shown on the Site Plan in Attachment A of the associated Operations Plan. Pesticides will be stored in their original containers and within a locked cabinet that provides secondary containment, which minimizes the potential for spills and accidental exposure. Pesticide containers will be properly labeled. The storage of pesticides will follow their manufacturer's guidelines. Only authorized personnel will have access to the cabinets containing pesticides.

Pesticides, emptied containers or parts thereof, or equipment that holds or has held a pesticide, will not be stored, handled, emptied, disposed of, or left unattended in such a manner that it presents a hazard to persons, animals, food, crops or property.

4.4 PESTICIDE SIGNAGE

AGH will post visible signs around all areas where pesticides are stored. Signs will be of such size that it is readable at a distance of 25 feet and will state the following:

"DANGER"
"POISON STORAGE AREA"
"ALL UNAUTHORIZED PERSONS KEEP OUT"
"KEEP DOOR LOCKED WHEN NOT IN USE"

The notice shall be repeated in an appropriate language other than English when it may reasonably be anticipated that persons who do not understand the English language will come to the enclosure.

4.5 PESTICIDE SPILLS

As stated previously, pesticides will be stored in secure containers that restrict access to unauthorized personnel and provide secondary containment in the event of container leaks. In addition, AGH will do the following to mitigate the potential for spills and minimize environmental exposure:

1. Develop procedures for the handling, storage, and inspection of pesticides.
2. Develop procedures for PPE, spill response, and spill reporting and record keeping.
3. Provide spill response equipment such as spill kits and emergency wash and eyewash stations.
4. Keep updated Safety Data Sheets (SDS) for pesticides and chemicals stored on-site.
5. Provide emergency contact information in the event of a spill that threatens the environment or life safety.

5.0 WASTE MANAGEMENT

AGH will cultivate cannabis plants in both the vegetative and flowering phases during the outdoor growing season which is typically June through November. AGH will harvest flowering plants once they reached maturity. During the growth process AGH will trim and prune the plants to ensure maximum plant health. During harvest AGH will trim dispose of stalks, stems, leaves, and parts of the cannabis plant that are considered waste.

Following harvest, the plants will be trimmed in the processing trailers. During this process there will be leaves and stems that are discarded. Cannabis leaves that can be used for pre-rolled joints will be stored for later use. Trichomes collected during the trim process will also be stored for later use.

Cannabis related waste associated with the activities described above include:

1. stalks and stems;
2. leaves and flowers;
3. post-process manufactured cannabis waste;
4. root balls and growing medium; and
5. any event resulting in exposure or compromise of cannabis products.

5.1 CANNABIS WASTE DISPOSAL

Cannabis waste that includes stalks, stems, leaves, flowers, root balls, or any compromised cannabis material will be composted onsite in the designated compost area shown on the Site Plans in Attachment A of the associated Operations Plan. The compost area will only be accessible to authorized personnel.

Growing medium will be not be disposed of and will be recycled and amended for reuse. Soil will be stockpiled in the soil stockpile area. AGH elects to integrate the composted material back into the soil.

All cannabis stalks, stems, leaves, flowers, or compromised cannabis material waste will be weighed prior to taking the waste to the composting area. Cannabis waste will be tracked and traced in accordance with CDFA requirements.

In the event AGH chooses to use a licensed waste hauler for cannabis waste disposal, AGH will coordinate with the licensed waste hauler for pickup days and times. In addition, AGH will perform the following:

1. record the name of the entity hauling the waste;
2. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
3. track all cannabis waste in accordance with state track and trace requirements; and
4. keep records of cannabis waste disposal.

6.0 TRAINING

AGH employees will be trained on the following:

1. Proper use of fertigation equipment.
2. Handling, storage, and application of pesticides and fertilizers. Employees responsible for pesticide application will obtain the required local certificates.
3. Methods and techniques for plant management.
4. Cleaning and maintenance procedures.
5. Procedures for cannabis waste management.
6. Procedures or cleanup and notification in the event of a spill.
7. Proper use of PPE.

All employees will be required to go through training upon beginning employment. Employees will also be provided refresher training on an annual basis. Training will be documented, and records kept as part of AGH's record keeping process.

7.0 RECORD KEEPING

AGH will maintain the following records:

1. logs for pesticide application;
2. logs for facility and equipment maintenance;
3. SDS sheets;
4. Cannabis waste disposal;
5. notification records in the event of a spill; and
6. training records.

Records will be kept for a period of seven years, or as required by County and CDFA regulations. Records will be available in either hardcopy or electronic format for agency review.

ATTACHMENT F – INVENTORY MANAGEMENT PLAN

INVENTORY MANAGEMENT PLAN

Prepared by:

AG HARVEST, INC.
6135 Huasna Townsite Road
Arroyo Grande, CA 93420

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1.0 INTRODUCTION

AG Harvest, Inc (AGH) has prepared this Inventory Management Plan for outdoor cannabis cultivation located at 6135 Huasna Townsite Road, Arroyo Grande, California 93420 (Project Site). Cultivation activities will include cannabis cultivation and cannabis processing as an ancillary use, which includes drying, curing, trimming, storage, and nonmanufactured cannabis products including pre-rolled joints and making kief using a mesh screen (non-mechanical).

The purpose of this Inventory Management Plan is to identify AGH's procedures for managing inventory control, tracking, and other inventory procedures required by local and state agency requirements. AGH will notify the local and state agencies of any substantial changes to this Inventory Management Plan.

1.1 FACILITY CONTACT INFORMATION

AG Harvest, Inc.
Anna Gabriel – Owner
6131 Huasna Townsite Road
Arroyo Grande, CA 93420
(805) 489-7489
huasnatownusa@gmail.com

1.2 ROLES AND RESPONSIBILITIES

The General Manager or their authorized designee will serve the following roles:

1. Compliance Officer,
2. Inventory Control Manager,
3. Employee Training manager, and
4. Record Keeping Manager.

Descriptions of the roles and responsibilities listed above are discussed in the associated Operations Plan.

2.0 INVENTORY PROCEDURES

All cultivated and harvested cannabis flowers and nonmanufactured cannabis products (i.e. pre-rolled joints and kief) will be stored in the "Processing Trailers" shown on the Site Plans in Attachment A of the associated Operations Plan. Cannabis products will not be stored outside or be visible to the public. Only authorized personnel will have access to the Processing Trailers. Secure storage areas will be continually monitored by the video surveillance system described in Attachment B – Security Plan of the associated Operations Plan.

2.1 TRACK AND TRACE USER REQUIREMENTS

The Inventory Control Manager will manage cannabis product inventory control by implementing the following measures:

1. The Inventory Control Manager will create and maintain an active and functional account within the California Cannabis Track and Trace (CCTT) Metrc system prior to engaging in any commercial cannabis activity, including the purchase, sale, testing, packaging, transfer, transport, return, destruction, or disposal, of any cannabis products.
2. The Inventory Control Manager or designated person will act as the CCTT Metrc system account manager. Any person authorized to be a CCTT Metrc account manager will be trained on the CCTT Metrc system prior to access or use. In addition, the account manager may authorize additional employees as users only if they receive CCTT Metrc system training.
3. Authorized account managers and employees authorized to use CCTT Metrc will attend and successfully complete all required CCTT Metrc system training, including any orientation and continuing education. All training records will be kept as part of AGH's record keeping procedures discussed in the associated Operations Plan.
4. The account manager and each authorized user will be assigned a unique login identification username and password. The account manager or each user accessing the CCTT Metrc system will be required to use their assigned login information and will not be permitted to use the login information of another employee or account manager. Under no circumstances will login information be shared or transferred to other individuals.
5. The Inventory Control Manager or authorized account manager will maintain a complete, accurate, and up-to-date list of all CCTT Metrc system users, including their full names and usernames.
6. Within three (3) calendar days, cancel the access rights of any track-and-trace user from the AGH's track-and trace system account if that individual is no longer authorized to use the licensee's CCTT Metrc system account;
7. Notify the department immediately for any loss of access that exceeds three (3) calendar days;
8. The Inventory Control Manager or authorized account manager will monitor all compliance notifications from the CCTT Metrc system. All compliance notifications will be resolved in a compliance with the notification timing requirements.
9. No track-and-trace account manager, user, or other licensee, employee, or agent shall intentionally misrepresent or falsify information entered into the CCTT Metrc system.

10. If AGH loses access to the CCTT Metrc system for any reason, AGH will prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access.
11. Once access to the CCTT Metrc system is restored, all inventory tracking activities that occurred during the loss of access shall be entered into the track-and-trace system within three (3) calendar days.
12. AGH will document the date and time when access to the CCTT Metrc system was lost, when it was restored, and the cause for each loss of access.
13. AGH will not transfer cannabis or nonmanufactured cannabis products to a distributor until such time as access to the system is restored and all information is recorded into the CCTT Metrc system.

2.2 TRACK-AND-TRACE SYSTEM UNIQUE IDENTIFIERS (UID)

1. Within five (5) calendar days of the date AGH's Inventory Control Manager or authorized designee was credentialed by the CDFA to use the track-and-trace system, the designated Inventory Control Manager shall request UIDs using the track-and trace system.
2. AGH will only use UIDs provisioned and distributed by CDFA or CDFA's designee.
3. AGH will maintain a sufficient supply of UIDs in inventory to support tagging.
4. AGH will use the CCTT Metrc system to document receipt of provisioned and distributed UIDs within three (3) calendar days of physical receipt of the UIDs by the licensee.
5. The UID shall accompany the cannabis products through all phases of the growing cycle.
6. AGH will ensure UIDs are attached to each mature plant. UIDs shall be attached to the main stem, at the base of each plant. The UID will be attached to the plant using a tamper evident strap or zip tie and placed in a position so it is visible and within clear view of an individual standing next to the mature plant to which the UID was assigned. and
7. UIDs will be kept free from dirt and debris.
8. AGH employees will not remove the UID from the mature plant to which it was attached and assigned until the plant is harvested, destroyed, or disposed.
9. Each harvested batch of cannabis will be assigned a unique harvest batch name which will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
10. UIDs are required for all cannabis and nonmanufactured cannabis products and will be associated with the corresponding harvest batch name from which the cannabis and nonmanufactured cannabis products (i.e. pre-rolled joints and kief) were derived.
11. Upon destruction or disposal of any cannabis or nonmanufactured cannabis products, the applicable UIDs will be retired in the track-and-trace system by the licensee within three (3) calendar days of the destruction or disposal and be performed in accordance with the Attachment C – Waste Management Plan of the associated Operations Plan.

2.3 TRACK AND TRACE REPORTING REQUIREMENTS

1. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any and all transfers of cannabis or nonmanufactured cannabis products to another licensee prior to the movement of the cannabis or nonmanufactured cannabis products from the Project Site.
2. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any and all cannabis or nonmanufactured cannabis products physically received or rejected from another licensee within twenty-four (24) hours of receipt or rejection of the products.
3. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any information related to the disposition of cannabis and nonmanufactured cannabis products, as applicable, on the licensed premises. All applicable information for each event listed below shall be reported in the track-and-trace system within three (3) calendar days of the applicable event:
    a. Creating a planting of an immature plant lot;
    b. Moving immature plants to a designated canopy area, or when an individual plant begins flowering, or when applying a UID to an immature plant;
    c. Destruction or disposal of an immature or mature plant;
    d. Harvest of a mature plant, or portion thereof. The following information must be reported into the track-and-trace system for each harvested plant, or portion thereof, or harvest batch:
        i. The wet weight of each harvested plant, or portion thereof, which must be obtained by the immediately after harvest of the plant, or portion thereof;
        ii. The net weight of each harvest batch;
        iii. The weight of cannabis waste associated with each harvest batch;
        iv. The unique name of the harvest batch and the initiating date of the harvest. For the purposes of this section, the initiating date of the harvest is the month, day, and year the first mature cannabis plant(s) in the harvest batch were cut, picked, or removed from the soil or other growing media. The initiating date of the harvest shall be recorded using the MM/DD/YYYY format. For example, January 1, 2018 would be recorded as 01/01/2018.
4. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any and all cannabis or nonmanufactured cannabis products physically received or rejected from for each transfer of cannabis or nonmanufactured cannabis products to, or cannabis or nonmanufactured cannabis products received from, another licensee. Required information to be entered includes, but is not limited to:
    a. Name, business address, and department or other licensing authority issued license number of the seller;
    b. Name, business address, and department or other licensing authority issued license number of the purchaser;
    c. Name and department issued license number of the distributor;
    d. Date of sale, transfer, or receipt (month, day, and year) of cannabis or nonmanufactured cannabis products;

e. Weight or count of individual units of cannabis or nonmanufactured cannabis products sold, transferred, or received;
f. Estimated departure and arrival time;
g. Actual departure time;
h. Description for each item, including strain or cultivar, and all of the applicable information below:
    i. plant;
    ii. flower;
    iii. leaf;
    iv. shake;
    v. kief; and
    vi. pre-rolls.

2.4 INVENTORY RECONCILIATION

AGH's Inventory Control Manager will perform the following:

1. Reconciling all on-premises and in-transit cannabis or nonmanufactured cannabis products inventories at least once every thirty (30) calendar days.
2. Recording the net weight of all harvested cannabis once the majority of drying, trimming, and curing activities have been completed, or within sixty (60) calendar days from the initial harvest date, whichever is sooner.
3. AGH will close out physical inventory of all cannabis and nonmanufactured cannabis product and UIDs, if applicable, prior to the effective date of any of the following changes to their license:
    a. Voluntary surrender of a temporary license or annual license;
    b. Expiration of an annual license; and
    c. Revocation of a license.
    d. description of the cannabis products with enough detail to identify the batch;
    e. weight of or quantity of units in the batch;
    f. best-by, sell-by, or expiration date of the batch, if any; and
    g. location in the facility where the batch is kept.
4. Close-out of physical inventory includes, but is not limited to, all of the following items:
    a. immature plants and their corresponding lot UID(s);
    b. mature plants and their corresponding plant UID(s);
    c. harvest batches and their corresponding UID(s);
    d. nonmanufactured cannabis products and their corresponding UID(s); and
    e. UIDs in the licensee's possession which have not been assigned in the CCTT Metrc System.
5. All sales and transfers will be documented as required herein.

3.0 TRAINING

AGH's Employee Training Officer will be responsible for ensuring employees are trained on the contents of this Inventory Management Plan. The Employee Training Officer will also ensure that employees authorized to access the CCTT Metrc system have received the appropriate training offered by the CCTT Metrc system administrator. Training records will be will be accessible to regulatory inspection upon request.

4.0 RECORDS

AGH's Record Keeping Manager will maintain the following records:

1. records relating to branding, packaging and labeling;
2. all supporting documentation for data or information entered into the CCTT Metrc System;
3. documentation associated with loss of access to the track-and-trace system
4. all UIDs assigned to product in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system must be retained for six (6) months after the date the tags were retired;
5. transportation bills of lading and/or shipping manifests for completed transports and for cannabis products in transit;
6. records relating to destruction of cannabis goods;
7. employee personnel and training records;
8. contracts with other state licensed cannabis businesses;
9. records relating to tax payments.

AGH will keep all records for a minimum of seven years, or as required by the County and CDFA. Records will be available in either hard copy or electronic format for review by agency personnel upon request.