

Operations Manual
for
Portfolio Investments, Inc.
Non-Volatile/Volatile Manufacturing,
Processing/Packaging, Testing, Distribution, Indoor
Cultivation, Nursery
3/19/18

Produced By:



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Project Name	PORTFOLIO INVESTMENTS
Project Location	PORTFOLIO ADDRESS. Rio Dell, CA, 95562
Project Sponsor	PORTFOLIO INVESTMENTS CLIENT ADDRESS Napa, CA, 94558
Sponsor Contact	CLIENT NAME/ NUMBER
Permitting Agency	AgDynamix, LLC Teisha Mechetti 707-798-6199
APN	205-111-040
Existing Zoning Designation	Industrial Commercial (IC)

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Table of Contents

Industry Analysis	11
Summary	11
State Regulatory Framework	11
Local Regulatory Framework	13
Humboldt County.....	13
Rio Dell	13
Executive Summary.....	14
Project Timeline (Proposed)	15
Phase 0.....	15
Phase .5.....	15
Phase 1	15
Phase 2.....	15
Project Overview.....	16
Project Summary.....	16
Location Description	16
Zoning	16
Performance Standards	16
Setbacks	16
Performance Standards	17
Setback Requirements	17
Nuisance Mitigation.....	17
Energy Use	17
Consent to Inspect	17
Maps	18
Overview Map.....	18
Assessor’s Parcel Map.....	19
Zoning Map	20
Jurisdictional Boundaries Map.....	20
Land Use (Critical Facilities) Map.....	21

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Streamside Management Areas Map	22
Flood Zones Map.....	23
Slope Map	24
Stability Map	25
Environmental Impacts & Standards	26
Summary	26
Background	26
Project-Specific Factors.....	28
Mandatory Compliance Factors.....	28
Water Sources.....	28
Initial Statement of Water Diversion & Use (ISWDU).....	28
Small Domestic Use Registration (SDU).....	28
Small Irrigation Use (SIU)	28
Lake and Streambed Alteration Agreements (LSAA-1600/1602)	28
Water Board Order: Waste Waiver Discharge (WWD)	28
Water Resource Protection Plan (WRPP).....	29
Department of Pesticide Regulation Requirements (DPR)	29
Archaeological Inspections & Survey	29
Additional Compliance Factors	29
Bureau of Cannabis Control (BCC)	29
Cal Cannabis Cultivation Licensing.....	29
Office of Manufactured Cannabis Safety	30
Project Management Plan	31
Parking Spaces	31
Emergency Measures.....	31
Area Plan.....	31
Summary	31
Landscaping Plan.....	31
Setbacks	31
Cannabis Safety Program	32
Cannabis Track and Trace Enrollment Verification.....	32

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Floor Plan (Building 1-3).....	32
Summary	32
Energy Use Offset Measures.....	34
Odor Control Plan	34
Summary	34
Active Ventilation.....	34
Secondary Containment	35
Operational Plan	36
Project Summary.....	36
Business Organization.....	36
Management Team.....	36
Overview	36
Business Description	38
Mission.....	38
Vision.....	38
Values.....	38
Days/Hours of Operation.....	38
Staff Shifts	38
Products & Services	39
Project Products.....	39
Sales & Marketing.....	39
Chain of Custody	39
Packaging	39
Distribution	39
Track and Trace Standards.....	40
Transportation	40
Prohibition of Onsite Consumption	41
License Screening & Registration.....	41
Record Acquisition and Retention.....	41
Record Acquisition Process.....	41
Record Retention Policy.....	41

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Program.....	41
Summary	41
Safety and Quality Assurance Procedure.....	41
Chain of Custody	42
Cannabis Track and Trace Enrollment Verification.....	42
Customer Intake Process	43
Labor Plan	44
Background	44
Summary	44
Project Details.....	44
Project Processing Environment.....	44
Housing	44
Administrative.....	45
Labor Management.....	45
Recording & Reporting.....	45
Performance Review Reports	45
Staff Screening	45
Background Investigation Results.....	46
Quality Assurance & Control of Product.....	46
Chain of Custody	46
Monitoring	46
Harvesting	46
Testing Procedure	47
Drying/Curing.....	47
Grading/Sorting.....	47
Processing	47
Packaging	47
Dosage Determination and Testing Procedure.....	47
Health & Safety	47
Job Hazard Analysis.....	47
Injury Illness Prevention Plan.....	47

Prepared for Portfolio Investments, Inc. by AgDynamix, LLC (March. 2018)

Heat Illness Prevention Plan	48
Hazard Communication Policies	48
Emergency Procedures	48
Chemical Handling	48
Eye Washing Station	49
Employee Accident Policies	49
Personal Protective Equipment Policies	49
Occupancy & Structural Guidelines	50
Notification of Occupancy & Terms	50
Maintenance of Sanitary Facility.....	50
Dust Control Measures	51
Water Access & Facilities	51
Security Plan.....	52
Summary	52
Criminal Activity Reward Reduction Measures.....	52
Project Specific Details:.....	52
Project Specific Security.....	53
Measures of Security	53
Security Map	53
Security Cameras	53
Points of Security (Proposed Room Layout)	53
Alarms	54
Exterior Lighting.....	54
Hardening Measures.....	54
Storage	54
Storage Room Features.....	54
Inventory Management	55
Prevention of Diversion	55
Cultivation Plan	56
Summary	56
Cultivation Schedule	56

Prepared for Portfolio Investments, Inc. by AgDynamix, LLC (March. 2018)

Water Resources.....	56
Irrigation System.....	56
Emergency Water Plan.....	56
Cultivation/Processing Equipment	57
Waste Management Plan (Soil/Green Material)	57
Waste Management Plan.....	58
Summary	58
Project Waste Management	58
Project Specific Details.....	58
Waste Management Standards	59
Organic Waste Handling	60
Track and Trace.....	61
Irrigation/Effluent Control	61
Effluent Waste Management.....	61
Hazardous Waste Handling.....	62
Hazardous Materials Storage.....	62
Hazardous Material Inventory	63
Project Equipment Inventory.....	63
Kitchen	63
Manufacturing (Non-Volatile).....	64
Manufacturing (Volatile).....	64
Processing/Distribution.....	64
Project Product Inventory.....	64
Soil Inventory	65
Hazardous Materials Waste Removal.....	65
Hazardous Waste Cleanup	65
Hazardous Material Standards.....	66
Agricultural Product Storage.....	66
Onsite Wastewater/Hazardous Wastes.....	66
Effluent.....	66
Chemical Spill Procedure/Handling	67

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Solid Waste Removal/Recycling.....	67
Water Production/Well Construction.....	67
Pest Management Plan.....	68
Genetic Host Resistance.....	68
Cultural Practices.....	68
Biological Control.....	69
Environmental Control.....	69
Chemical Applications.....	70
Government Regulatory Measures.....	71
Appendices.....	74
Source Guide for Federal & State Requirements for Employee & Migrant Housing.....	74
Housing Standards/Requirements for Employee/Migrant Housing Caretakers.....	74
Sources of Additional California Regulatory Information.....	75
Federal Governing Bodies & Regulatory Framework.....	75
Summary of Employment Requirements for California Agricultural Employers.....	76
Table of Contents.....	76
Cal/OSHA.....	76
Definitions.....	76
Heat-Illness Prevention.....	76
Emergency Action Plan.....	76
Hazard Communication Program.....	77
Injury and Illness Prevention Program.....	77
Pesticides.....	77
Pesticide Postings.....	77
Wage-and-Hour Requirements.....	78
Federal & State Wage Provisions.....	78
Federal Provisions & California Provisions.....	78
Definitions.....	80
Additional Definition of Terms.....	81
General.....	81

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Summary of Employment Requirements for California Agricultural Employers Transportation of Interstate Commerce Act (ICA) Regulations 83

 Housing 83

 Definitions 84

 U.S Department of Labor 85

 Summary of Employment Requirements for California Agricultural Employers 87

Glossary of Abbreviations & Definitions 88

Other Relevant Sources 92

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Industry Analysis

Industry regulations have been enacted at the State, County, local and—in some instances—municipal levels. The proposed Project will adhere to all applicable regulations.

Summary

A complex framework of regulatory laws influences cannabis cultivation regulations pertaining to the proposed Project, including Proposition 215, the Compassionate Use Act, Senate Bill 420, and the Medical Cannabis Regulation and Safety Act (MCRSA), and Proposition 65 (Prop 64) or the Adult Use Marijuana Act (AUMA), and most recently the Medical Adult Use Cannabis Regulation Safety Act (MAUCRSA).

Local permitting must be obtained before seeking licensure at the State level (which becomes effective January 2018). Some local jurisdictions in California, to date, have established and implemented regulations to per miss, permit, and/or license cannabis business operations.

In November 2016, the AUMA legalized “recreational” cannabis possession, consumption, and personal indoor cultivation, but had no effect on medical marijuana permitting or licensing.

On June 27th, Senate Bill 94, otherwise known as, the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA) by Governor Jerry Brown in efforts to consolidate the two legislative pieces put in effect to govern commercial medical and recreational cannabis activities, otherwise known as the consolidation of the MCRSA and AUMA. The merge of these two legislative pieces features changes to the licensing scheme that we were working within prior to its effect.

State Regulatory Framework

With the passage of the Compassionate Use Act (Proposition 215) in 1996 and the Medical Marijuana Program Act (MMPA) in 2003 (Senate Bill 420), California created a system of possession and cultivation limits, a voluntary identification program, and assurance of a non-diversionary system of medical cannabis cultivation and dispensation. The intent of these legislative efforts was to clarify the scope of application, prevent arrest and prosecution, promote uniform application, increase accessibility of product, and address issues within the act to promote fair and orderly implementation.

In September 2015, the California State legislature enacted three bills under the MCRSA, consisting of AB-243, AB-266, and SB-643. Each bill addresses various issues pertaining to licensing and regulatory requirements involving medical cannabis cultivation, manufacturing, transportation, distribution, sales, and testing. These bills became effectual January 1, 2016, with State licensing to open on January 1, 2018.

The MCRSA establishes a multiagency framework to regulate commercial cannabis. The foundation of MCRSA is: “No person shall engage in commercial cannabis activity without possessing both a State license and a local permit, license, or other authorization.” This legislation provides for the licensure of commercial cannabis activity in California, strengthens environmental protections, and creates licensing opportunities for small and specialty cultivators.

Assembly Bill 243 (AB-243) requires the CDFA, CDFW, and State Water Resources Control Board (SWRCB) to promulgate regulations and standards pertaining to medical cannabis cultivation efforts, mitigate impacts on environments, and coordinate enforcement efforts with State agencies.

Assembly Bill 266 (AB-266) addresses the licensure and regulation of medical marijuana for which the framework is primarily the responsibility of the Bureau of Cannabis Control (BCC) to enforce under the Department of Consumer Affairs' (DCA) and the Bureau of Medical Cannabis Regulation. Collaboratively, the Board of Equalization (BOE) and the CDFA are responsible for tracking and reporting the movement of cannabis goods throughout the State.

Senate Bill 643 (SB-643) addresses the setting of standards on behalf of physicians and surgeons prescribing medical cannabis and requires the Medical Board of California (MBC) to implement investigations of physicians who repeatedly or excessively prescribe medical cannabis to customers without good faith exemption. This bill requires the BMCR to gather fingerprints to conduct criminal history background checks.

This Act also grants the DCA sole authority to implement and govern the system for creation, issuance, renewal, discipline, suspension, or revocation of such licensure under the Bureau of Cannabis Control program. Additionally, the CDFA is responsible for administering provisions of the act related to or associated with cultivation and transportation of medical cannabis. This bill also authorizes counties and municipalities to propose and implement taxation on medical cannabis activity.

In addition to the initial framework developed to support local regulations and State licensing, there has been a broad legislative effort to institute clean-up bills to further clarify the scope and definitions under the MCRSA.

The Adult Use of Marijuana Act (AUMA), which passed in November 2016, has legalized adult use ("recreational") cannabis possession, consumption, and limited personal indoor cultivation. Because the AUMA legislation addresses only recreational cannabis issues, it currently has no effect on medical marijuana permitting or licensing.

On June 27th, Senate Bill 94, also known as, the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA) signed by, Governor Jerry Brown, in efforts to develop a single regulatory structure that governs commercial medical and recreational cannabis activities, collectively known as MCRSA and AUMA. The merge of these two legislative pieces features changes to the licensing scheme that were in effect prior to the implementation of MAUCRSA.

The creation of MAUCRSA prompted 23 license type activities varying from Cultivation, Processing, Manufacturing, Packaging, Infusion, Testing, Retail, Distribution, and Microbusiness licenses. License types 5-5B will not be available until 2023. Across the license types they will be assigned either an "A" for Adult Use or "M" for Medical operations. The introduction of new license types Type 5-5B Cultivation, Processing, Manufacturer I and II, Packaging, Infusion, and Microbusinesses was an introduction of license types carried from the AUMA. The MAUCRSA also now excludes transportation as a license type. Furthermore, clarification of the fact, points concerning that event licenses are not prohibited under this framework were also clarified. The local authority could issue event permits for "onsite cannabis sales to, and consumption by, persons 21 years of age or older at a County Fair or District Agricultural Association Event".

According to this legislation, an applicant may now pursue a State license without local approval, however, may not conduct activities until local approval is met, otherwise could prompt a violation that would make the State license applicant ineligible to hold the license.

Local Regulatory Framework

Under State legislation, MCRSA, municipalities possess the authority to set their own regulations pertaining to land use and commercial cannabis business activities. Local permitting must be obtained before seeking licensure at the State level (which becomes effective January 2018).

Humboldt County

In October 2015, Humboldt County began its review process of the Commercial Medical Cannabis Land Use Ordinance (CMCLUO). This legislation governs commercial medical cannabis activities within the authority of the County of Humboldt and establishes zoning regulations, performance standards, and environmental compliance—as well as requiring proof of documentation. The ordinance went into effect February 26, 2016. The deadline for applicants was December 31, 2016.

On September 13, 2016 Humboldt County issued a correcting and clarifying document to address the elements of the CMCLUO that were not clear under the initial Ordinance No. 2544 and the implementation of the program.

An Environmental Impact Report is underway to assess the overall impacts of this program which could significantly affect the Commercial Cannabis Land Use Ordinance, once the results of the study have been considered.

March,

Rio Dell

Executive Summary

The Applicant seeks a Conditional Use Permit (CUP) for a Cannabis Facility (CF) in the form of three facilities to support a multitude of activities such as cultivation, nursery, manufacturing (Volatile/Non-Volatile), Infusion, Processing/Packaging, Distribution, and Testing within the authority of the City of Rio Dell.

Portfolio Investments, Inc. is a for-profit corporation designed to conduct Agricultural activities and offer Management services.

Sponsor proposes to create up to fifty-five (55) jobs to the local Rio Dell area, and support agricultural labor with education, training, and quality work environments. This project site possesses features that will equip the project for maximum success within the City of Rio Dell and the State of California.

The parcel of question involves Parcel No. 205-111-040 and is measured at 2.39 acres and is zoned Industrial Commercial (IC) and qualifies for commercial cannabis activities within the authority of the City of Rio Dell. The applicant is pursuing a Conditional Use Permit (CUP) for cannabis activities, and will pursue licenses for Volatile/Non-Volatile Manufacturing, Infusion Manufacturing activities, Cultivation, Nursery/Propagation activities, Processing/Packaging, Distribution, and Testing activities (To be held by tenant).

To date the site has had a completed Traffic Study, and Water main calculations have been configured by A.M. Baird Engineering through the Glen White project to run water main hookups to each of the individual sites. Additionally, A.M. Baird has conducted a base foot elevation study for the general area surrounding the parcel in question for an adjacent project. A septic suitability report has been completed as a preliminary to identify the viability of a commercial scale septic system designed to support the three facilities grey/black water wastes. Preliminary data has been put together to prepare a grading plan to relocate the drainage ditch to the North end of a proposed road access and prepare the site for the building(s).

The infrastructure proposed is two (2) 9,600 sq. f.t buildings and one (1) 6,000 sq. ft. building developed under a two-phase plan. A temporary phase is being proposed to support the use of four (4) FlexMod skid systems intended for: one (1) Volatile Manufacturing, one (1) Processing/Distribution, one (1) administrative building, and one (1) restroom facility with external above ground septic reserve to be serviced regularly.

The buildings would solely be services by the water main to be developed and serviced by the City of Rio Dell. A temporary water solution will be implemented via a groundwater well to support temporary and long term back up water uses. Additionally, power would be supported by a three-phase power drop supplied by PG&E. Natural gas will also be supplied by PG&E to support the HVAC systems for the facilities. It is likely that due to the sensitivity of the operations there will be a plan for back-up power generation supplied by natural gas. Black and greywater wastes will be supported by a 3,500-gallon reserve and three (3) 90' leach fields. Septic designs are subject to change upon final occupancy calculations provided within this document.

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Project Timeline (Proposed)

Phase 0

- Obtain Conditional Use Permit.
- Obtain Well Permit.
- Install Groundwater Well.
- Obtain Encroachment Permits for Road Access.
- Obtain Grading Permit.
- Obtain Septic Permit.
- Obtain Building Permits.
- Run Power Drop.
- Run Water Main to Parcel.

Phase .5

- Grading for FlexMod Structures.
- Install four (4) Flex Mods to be used temporarily for Volatile Manufacturing, Processing/Distribution, Administrative, and Rest Facilities.

Phase 1

- Begin Drainage Relocation to Support New Improved Road Access.
- Grade Building Sites.
- Install Septic.
- Paving/ LID Drainage.
- Erect Building #1 & #2 Infrastructure.
- Finish Building #2 (First).
- Install Security.
- Launch Operations in Building #2.
- Finish Building #1 (Second).
- Finalize Install of Security.
- Launch Operations in Building #1.
- Move & Retrofit FlexMods inside of units within Building #1.

Phase 2

- Erect Building #3.
- Finish Interior Design.
- Finalize Install of Security.
- Launch Operations in Building #3.

Project Overview

Project Summary

The Project concerns Parcel No. 205-111-040 in Rio Dell, California that is seeking a Use Permit to conduct cannabis activities to support three multi-use facilities which will house volatile/non-volatile manufacturing, processing/packaging, distribution, indoor cultivation, nursery, and testing activities with consideration of a phased approach to development involving Phase .5/1/2/3 (See phased development in executive summary).

The Project parcel is zoned Industrial Commercial, which falls within the allowable zoning specified by the local authority.

Location Description

The proposed Project would occur on legal Parcel No. 205-111-040 at PORTFOLIO ADDRESS. Rio Dell, CA, in the northwest and the northeast quarters of Section 36, Township 2 North, Range 1 West, Humboldt Meridian.

Zoning

The property features zoning Industrial Commercial and the following characteristics:

- GIS acres: 2.39 Acres.
- Coastal Zone: Outside.
- 100 Year Flood Zone: Inside.
- Alquist-Priolo Fault Hazard Zone: Outside.
- Geologic Unit: D
- FEMA FIRM Flood Rating & Panel Number: 1220F.
- Slope: <5%.
- Relative Slope Stability (Per General Plan Geologic maps): BO Relatively Stable.

Performance Standards

Setbacks

The proposed CF is approximately 1.5 distance miles from the nearest K-12 school (as measured in a straight line from the property line of the school to the closest property line of the lot on which the CF is located), outside of and fully complying with the 600-foot setback imposed by the City of Rio Dell. This setback requirement excludes any private schools where education is primarily conducted in private homes.

Performance Standards

Performance standards include nuisance mitigation (for noise, odors, light, and other potential hazards of the Project), setback requirements, and a consent to inspect.

Setback Requirements

The proposed Project area meets all setbacks required by the local authority and adheres to all other setbacks from neighboring parcels and property boundaries.

There are no known schools, school bus stops, public parks, places of religious worship, or Tribal cultural resources that are known within 600' to 1,320' of the cultivation area. Additionally, a 30' setback from the PG&E pole and 12' of overhead lines and property borders is satisfied.

Setbacks from nearby waterways adhere to the NCRWQCB and the CDFW's setback requirements. It is deemed that Environmentally Sensitive Habitat areas will not be impacted by the proposed Project.

Nuisance Mitigation

The Project would mitigate the potential for existing nuisances, including odors, lights, sounds, and other nuisances that extend beyond the boundaries of an adjacent property, with adherence to State and local (County and/or municipality) regulations pertinent to this Project.

Best mitigation efforts:

- Odor: Scrubbers.
- Light: Escape shielding.
- Sound: Buffering.

Energy Use

Energy is to be supplied by 3-phase power to be supplied by PG&E to support the energy needs of all three proposed facilities.


Consent to Inspect

This section hereby grants to the relevant authority an authorization to conduct an annual compliance inspection with a minimum notice of 24 hours. The inspection would be conducted by officials during regular business hours (Monday-Friday, 9:00 am-5:00 pm), excluding holidays.

Maps

Overview Map



 **Mountain Investments, Inc. Overview Map**

Humboldt County Planning and Building Department

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Map Disclaimer:
While every effort has been made to assure the accuracy of this information, it should be understood that it does not have the force & effect of law, rule, or regulation. Should any difference or error occur, the law will take precedence.

Principal Arterials	Major River or Stream	Intermittent
Minor Arterials	Subsurface	City Boundary
Major Collectors	Perennial 1-3	Counties
Minor Collectors	Perennial >4	Parcels (no APN labels)
Local Roads		
	Private or Unclassified	

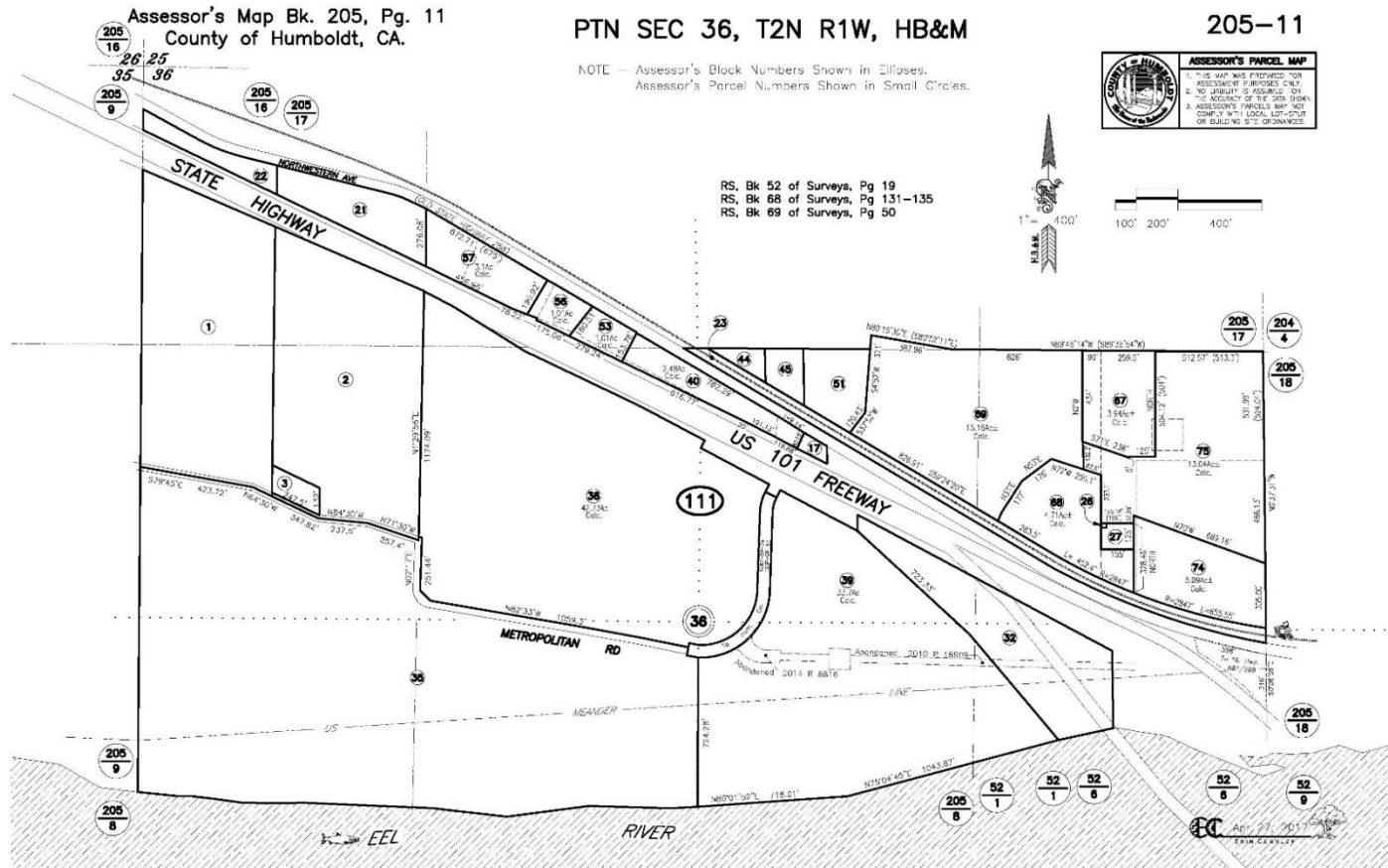
Scale: 0 60 120 240 Feet
0 0.01 0.02 0.04 Miles
RF= 1:1,128 1 in = 94 ft

Source: NRCG
Humboldt County GIS
California Coastal Commission GIS Mapping Unit, 2014
Esri, HERE, Garmin, @OpenStreetMap contributors, and the GIS user community
Source: Esri, DeLorme, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Assessor's Parcel Map



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Zoning Map

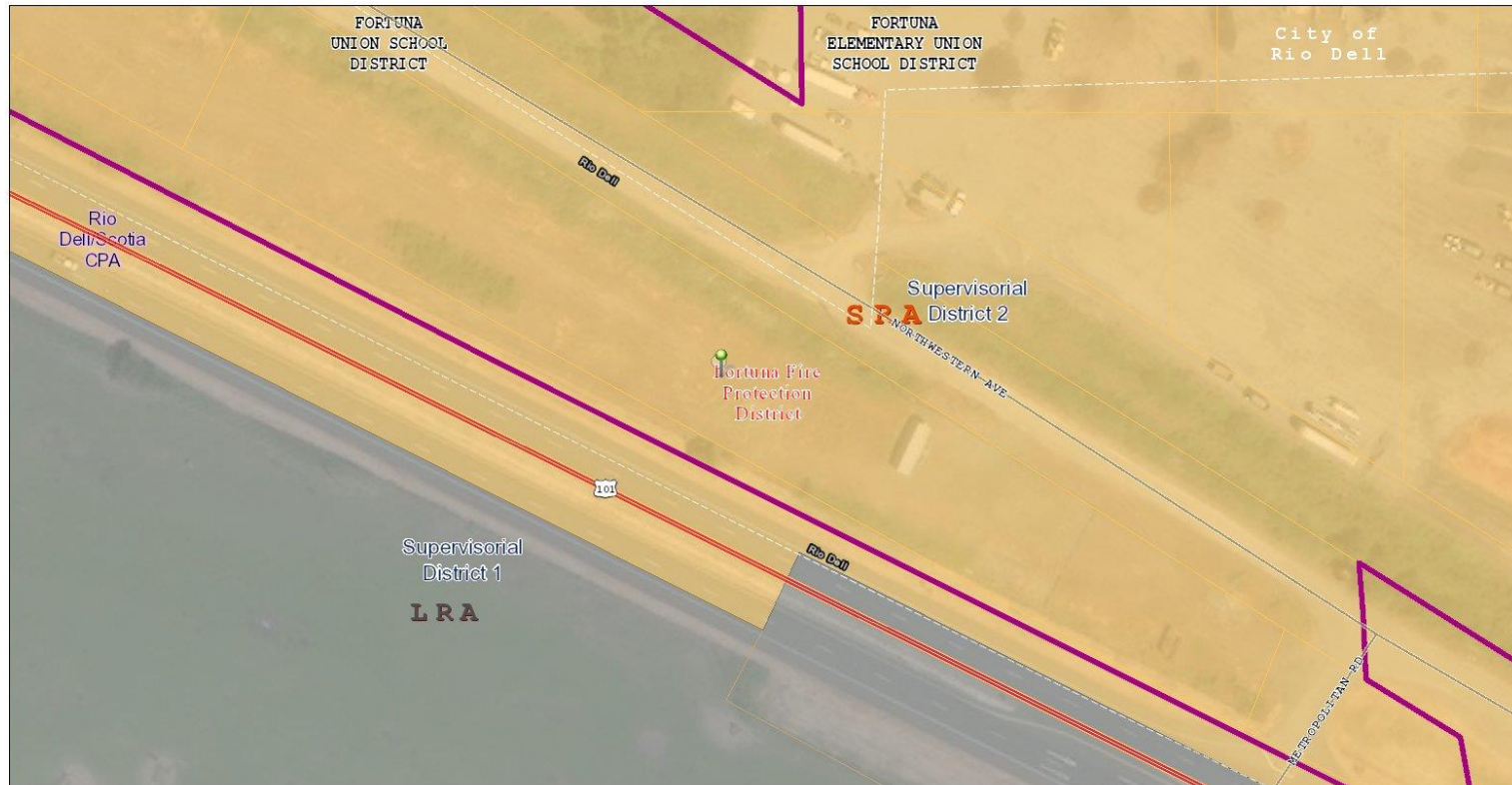
Jurisdictional Boundaries Map



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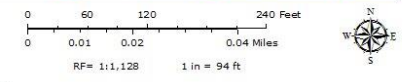


Land Use (Critical Facilities) Map



 **Mountain Investments, Inc. Jurisdictional Boundaries Map**
 Humboldt County Planning and Building Department
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- | | | | |
|-------------------------|-------------------------|------------------------------------|-----------------------------|
| Highways and Roads | Major River or Stream | City Boundary | FRA |
| Minor Arterials | Blue Line Streams | School Districts | Community Service Districts |
| Major Collectors | Perennial 1-3 | Fire Districts | District |
| Minor Collectors | Perennial >4 | Wildfire Responsibility (Cal Fire) | Supervisorial Districts |
| Local Roads | Intermittent | SPA | City Sphere |
| Private or Unclassified | Subsurface | LRA | Counties |
| | Community Planning Area | | |



Sources: NRCS
 Humboldt County GIS
 California Coastal Commission GIS Mapping Unit, 2014
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Streamside Management Areas Map



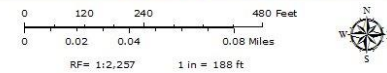
Mountain Investments, Inc. Streamside Management Map

- Parcels (no APN labels)
- Streamside Management Areas

Humboldt County Planning and Building Department

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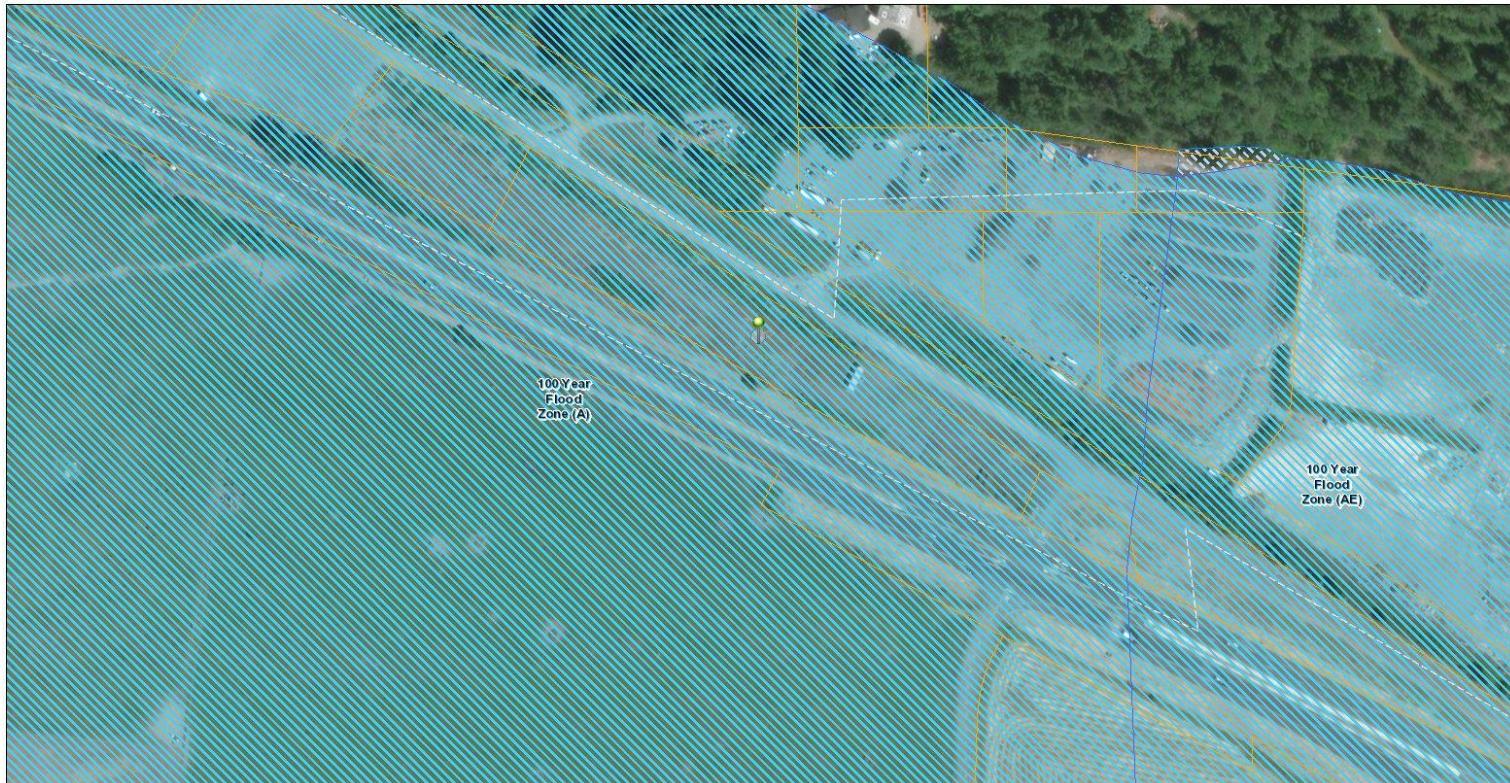


Sources: NRCS
 Humboldt County GIS
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Flood Zones Map



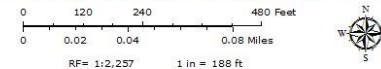
Mountain Investments, Inc. Flood Map

Humboldt County Planning and Building Department

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- Parcels (no APN labels)
- Awareness Floodplain
- FEMA Flood Zones (6/21/2017)**
- 100 Year Flood Zone (A, AE, AO, VE)
- 500 Year Flood Zone (Shaded X)
- Floodway
- LOMAs_and...**
- Property
- Structure



Sources: NRCS
Humboldt County GIS
California Coastal Commission GIS Mapping Unit, 2014
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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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Slope Map

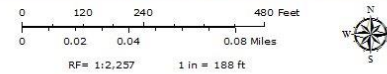


Mountain Investments, Inc. Slope Map

- Parcels (no APN labels)
- <15%

Humboldt County Planning and Building Department

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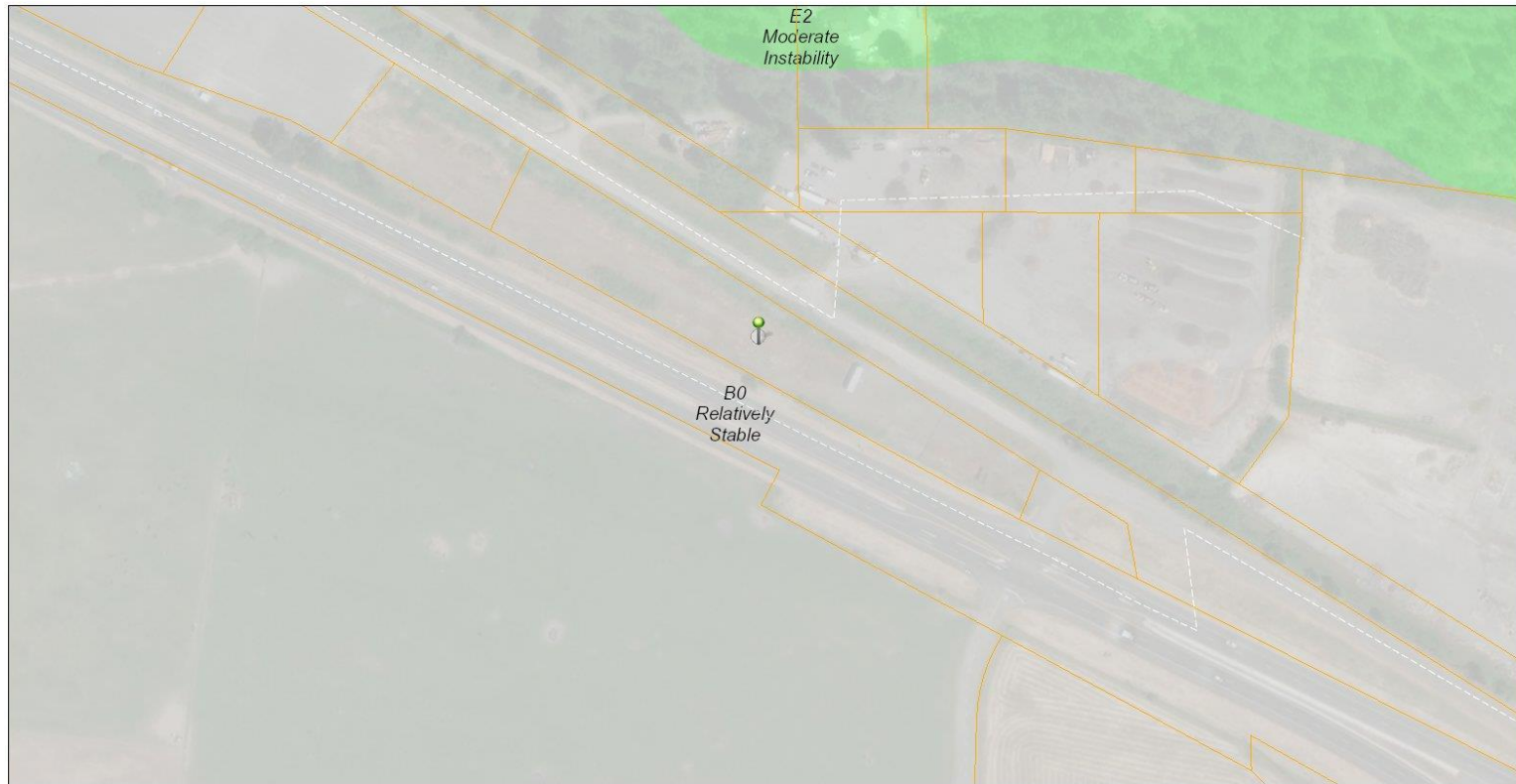


Sources: NRCS
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 California Coastal Commission GIS Mapping Unit, 2014
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Prepared for Portfolio Investments, Inc. by AgDynamix, LLC (March, 2018)



Stability Map



Mountain Investments, Inc. Stability Map
Seismic Safety

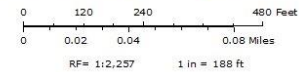
Humboldt County Planning and Building Department

Printed: March 5, 2018 Web AppBuilder 2.0 for ArcGIS

Map Disclaimer:
While every effort has been made to assure the accuracy of this information, it should be understood that it does not have the force & effect of law, rule, or regulation. Should any difference or error occur, the law will take precedence.

Parcels (no APN labels)

- Parcels (no APN labels)
- 3 High Instability
- 2 Moderate Instability
- 1 Low Instability
- 0 Relatively Stable



Sources: NRCS
Humboldt County GIS
California Coastal Commission GIS Mapping Unit, 2014
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Prepared for Portfolio Investments, Inc. by AgDynamix, LLC (March, 2018)



Environmental Impacts & Standards

Environmental impacts and standards include a comprehensive summary of all environmental elements related to the proposed Project. Impacts could include land use, development, pollutants, nuisances, and related environmental concerns. Federal and State standards have been set—with oversight from the United States Environmental Protection Agency (EPA) and the U.S. Department of Agriculture (USDA)—regarding potential environmental impacts caused by general industry applications.

Mitigation measures that can be employed for cultivation activities to prevent environmental detriment often feature the implementation of Best Management Practices (BMPs) suggested by the State Water Resources Control Board (SWRCB) under the Water Board Order and enrollment/compliance with the Waste Waiver Discharge (WWD) program through the North Coast Regional Water Quality Control Board (NCRWQCB). This can include the potential requirement for a Water Resource Protection Plan (WRPP). Additional conformance may be required with the California Department of Fish & Wildlife (CDFW) (formerly Fish & Game) under a Lake and Streambed Alteration Agreement (LSA-1600/1602).

All projects must also adhere to standards and maintain compliance with regulations set forth by the Division of Environmental Health (DEH) through a Contingency Plan (see *Contingency Plan* below) regarding all wastes (known as a Waste Management Plan). Applicants must also abide by regulations set forth by the Department of Pesticide Regulations (DPR) and the Tribal Historical Preservation Office (THPO) for archaeological preservation.

Often it is found, during the review of the Project, that there may be additional requirements and/or specific needs to support a sound environmental action or mitigative plan to adhere to the standards set under additional agency authority.

Summary

Potential Project impacts could include biological resources, land use/planning, transportation/traffic, agriculture and forestry, hazards and hazardous materials, public services, utilities/service systems, geology/soils, and hydrology/water quality.

Development impacts could include those regarding landscapes, infrastructure, roadways, and other environmental ramifications resulting from the Project.

Nuisance mitigation would include prevention of environmental impacts such as through odors, lights, and sounds that could potentially adversely affect neighboring properties or habitats. The proposed Project area would be required to meet all setback standards required by all agencies within the State of California and the local authority.

Background

On January 1, 1970, President Nixon signed the National Environmental Policy Act (NEPA). California Governor Reagan followed suit by signing the California Environmental Quality Act (CEQA) into law on September 18 of the same year. These laws required the incorporation of environmental values into governmental decision making. These statutes require Federal, State, and local agencies to analyze and disclose the potential environmental impacts of their decisions, and—in the case of CEQA—to minimize significant adverse effects to the extent feasible.

NEPA was codified under Title 42 of United States Code § 4331 et seq. (42 U.S.C. 4331 et seq.). Under NEPA, Congress established the White House Council on Environmental Quality (CEQ) to ensure that Federal agencies meet their obligations under the Act. CEQ's Regulations for Implementing the Procedural Provisions of NEPA are found in Title 40 of the Code of Federal Regulations, § 1500 et seq. (40 CFR 1500 et seq.). In California, CEQA was codified under Division 13 of California's Public Resources Code (CPRC), section 21000 et. seq. (Cal. Pub. Res. Code § 21000 et seq.). The Guidelines for Implementation of the CEQA regulations are in Title 14 of the California's Code of Regulations (CCR), § 15000 et seq. (14 CCR § 1500 et seq.).

NEPA and CEQA are similar, both in intent and in their respective review processes (analysis, public engagement, and document preparation) that they dictate. Importantly, both statutes encourage a joint Federal and State review for projects that require both Federal and State approvals. In such cases, a joint review process can avoid redundancy, improve efficiency and interagency cooperation, and be easier for applicants and citizens to navigate. Despite the similarities between NEPA and CEQA, there are several differences that require careful coordination between the Federal and State agencies responsible for complying with the statutes. Conflict arising from those differences can create unnecessary delay, confusion, and legal vulnerability.

Federal, State, and local agencies have cooperated in the environmental review of projects ranging from infrastructural development to renewable energy permitting. As State and Federal governments continue to pursue shared goals, there will be a continued need for an efficient and transparent environmental review processes that meets the requirements of both statutes.

Recognizing the importance of implementing NEPA and CEQA efficiently and effectively, the CEQ and the California Governor's Office of Planning and Research (OPR) developed a handbook regarding conducting joint NEPA and CEQA review processes. The CEQ oversees Federal agency implementation of NEPA, which includes writing the CEQ NEPA regulations and preparing guidance and handbooks for Federal agencies.

OPR plays several roles in the administration of CEQA, including development of CEQA Guidelines in coordination with the California Natural Resources Agency, providing technical assistance to State and local agencies, and coordinating State-level review of CEQA documents. Agencies conducting an environmental review must also consider any additional requirements or deadlines established in the individual agency's administrative regulations or procedures that implement NEPA and CEQA. These requirements could prescribe additional or more stringent requirements than the CEQ regulations and CEQA guidelines.

The NEPA and CEQA handbook provides practitioners with an overview of the NEPA and CEQA processes and practical suggestions for developing a single environmental review process that can meet the requirements of both statutes. The handbook contains three main elements. First is a "Question and Answer" section that addresses the key similarities and differences between NEPA and CEQA. This section compares each law's requirements or common practices and identifies possible strategies for meeting the requirements of both laws. These strategies are not meant to prescribe methods that agencies must use; rather, the handbook provides suggestions that help agencies identify and analyze potential issues.

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Project-Specific Factors

The following table details any potential effects to environmental elements related to the Project:

<input checked="" type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input checked="" type="checkbox"/>	Geology/Soils
<input type="checkbox"/>	Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Hydrology/Water Quality
<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Noise
<input checked="" type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Transportation/Traffic	<input checked="" type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Mandatory Findings of Significance

Mandatory Compliance Factors

In accordance with the State of California, it is a requirement that agricultural/industrial operation obtain the appropriate environmental filings to support land alterations, diversions, and discharges of effluent.

Water Sources

Water will be temporarily sourced from an onsite groundwater well. Project facility water demands are to be supported by the City of Rio Dell with the implementation of a water main being implemented by Glen White to support the industrial parcels water demands for long range planning projects.

Initial Statement of Water Diversion & Use (ISWDU)

No ISWDU Applies.

Small Domestic Use Registration (SDU)

No SDU Applies.

Small Irrigation Use (SIU)

No SIU Applies.

Lake and Streambed Alteration Agreements (LSAA-1600/1602)

It was determined that a LSAA-1600/1602 will not be required for this Project. There will be culverts installed to a relocated drainage, however, it will not prompt a California Department of Fish & Wildlife (CDFW) notification. A third-party agent may conduct periodic inspections on behalf of CDFW to determine any additional applications for filing.

Water Board Order: Waste Waiver Discharge (WWD)

Initial inspections by the Regional Water Board regarding water usage and discharges will be conducted prior to cultivation and nursery activities to take place. The initial notice of intent and

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monitoring/reporting forms, under the WWD, will be filed with the North Coast Regional Water Quality Control Board (NCRWQCB) under the State's Water Boards (SWB) General Water Board Order. A reporting/recording system would be developed, monitored, and reported to comply with annual renewal requirements under this order.

The proposed Project could feasibly fall into Tier 2* due to the self-contained features of the project overall footprint impact, and water uses. It is deemed the Project does not pose a notable threat to the environment due to several conditions that are documented within this application.

Water Resource Protection Plan (WRPP)

A WRPP will be generated by one of our third party verified agents. This document is held by the third-party agent and applicant which maintained onsite to satisfy any request by the SWB. This ensures protection of nearby habitats via management of setbacks, spoils, management of runoff/discharges, use of DPR-approved inputs, correct use of fertilizer, and proper storage of fungicides, pesticides, and fuels.

Department of Pesticide Regulation Requirements (DPR)

The Project would adhere to DPR requirements and limitations regarding pesticide, fungicide, and rodenticide inputs for cannabis cultivation and management of pests and/or disease. Quality and consumer-safe production requires cannabis cultivation inputs that are approved as environmentally sound and deemed safe for human consumption.

Archaeological Inspections & Survey

There is no current archaeological inspection on file of which the permitting agent is aware. A study is believed to have been conducted within the past 30 years for prior development. Records may be accessible through Sonoma State University's Northwest Information Center (NWIC) and the local THPO.

Additional Compliance Factors

Bureau of Cannabis Control (BCC)

In 2015, the Legislature passed, and the Governor signed into law three bills (Assembly Bills 243 and 266, and Senate Bill 643) that create a licensing and regulatory framework for medical cannabis through the Medical Cannabis Regulation and Safety Act. Later this was updated through the MAUCRSA, Senate Bill 94. This legislation created the Bureau Cannabis Control within the Department of Consumer Affairs. It also divided the responsibility for state licensing between three state entities – the CA Department of Food and Agriculture, the CA Department of Public Health, and the Bureau of Cannabis Control, with the Bureau designated as the lead agency in regulating the cannabis industry in California. This agency is responsible for licensing concerning testing, retail, distribution, transportation, and microbusinesses.

Cal Cannabis Cultivation Licensing

As directed by the Medical Cannabis Regulation and Safety Act and the Adult Use of Marijuana Act, the California Department of Food and Agriculture (CDFA) has written the proposed regulations to establish **cannabis cultivation and processing licensing** and a **track-and-trace system**, collectively referred to as **Cal Cannabis Cultivation Licensing**.

Office of Manufactured Cannabis Safety

OMCS was established in the Center for Environmental Health of the California Department of Public Health (CDPH) after the Governor signed into law the Medical Cannabis Regulation and Safety Act in 2015. The Act established a licensing and regulatory framework for the manufacturing, packaging, and infusion of cannabis in California.

The Medical Cannabis Regulation and Safety Act created the Bureau of Cannabis Control in the Department of Consumer Affairs, and tasked the following Departments to establish regulations for the cannabis industry:

CA Department of Consumer Affairs (Bureau of Cannabis Control): to license transporters, distributors, dispensaries, microbusinesses, and testing laboratories.

CA Department of Food and Agriculture (Cal-Cannabis Cultivation Licensing): to license cultivators and processors and will be responsible for implementing the Track-and-Trace System for plants from seed to sale.

CA Department of Public Health (Office of Manufactured Cannabis Safety): to license manufacturers of cannabis.

Project Management Plan

The proposed CF involves two (2) 9,600 sq. ft. buildings hereby referred to as Building #1 and Building #2 and one (1) 6,000 sq. ft. building referred to as Building #3 that will be constructed under a two phase plan that would feature a temporary plan to utilize four (4) temporary modular systems to support Processing/Distribution, Volatile Manufacturing, one Administrative building, and one (1) restroom facility.

Parking Spaces

Building #1 is supported by twenty-eight (28) parking spaces and one (1) ADA Parking space; Building #2 is supported by fourteen (14) parking spaces and one (1) ADA parking space; and Building #3 is supported by twelve (12) parking spaces and two (2) ADA parking spaces (for verified customers and administrative support). The proposed CF is thirty (30) feet from the property line.

Emergency Measures

The building design will require sprinkler suppression, and the applicant proposed to install chemical suppression in the commercial kitchen, break room/mess hall, and the FlexMod units designed to support volatile manufacturing are pre-fabricated with chemical suppression and blast proofing. Employees will be trained to make the appropriate contact to both the Rio Dell Volunteer Fire Department and the Fortuna Fire Department.

Area Plan

Summary

The proposed CF cannabis facilities will be located at PORTFOLIO ADDRESS. Rio Dell, CA, 95562 directly North of the City of Rio Dell town center on the east side of the US-101N corridor.

The proposed CF complies with all setbacks for K-12 schools, excluding any private schools in which education is primarily conducted in private homes. A detailed *Odor Control Plan* prevents the aroma of product from escaping the facility, ensuring no negative impact to the surrounding community.

Landscaping Plan

As per the City ordinance a landscaping plan has been proposed for the Highway side of the lot as well as within the access perimeter of the facility. The highway side of the lot known as the Southern border would feature Escalonia, and the entry access will be a range between flowering perennials and a combination of dwarfing evergreen and traditional evergreen bushes.

Setbacks

The area surrounding the proposed CF features the following characteristics:

1. Distance to nearest K-12 school: +/- 1.5 miles.
2. Distance to closest official K-12 bus stop: N/A
3. Distance to closest church: >1 mile.
4. Distance to closest residential dwelling: .45 miles in either direction.
5. Number of adjacent properties: Five (5).
6. All property setbacks satisfied: Yes.
7. Zoning: Industrial Commercial (IC).

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Cannabis Safety Program

The chain of custody of all cannabis product will be tracked via the Humboldt County SICPA track and trace reporting program for proof of origin and the State's METRC reporting system. Safety and quality assurance measures will include batch testing by an independent, certified laboratory of all product sold to customer customers.

Cannabis Track and Trace Enrollment Verification

The Cannabis Track and Trace Enrollment Verification is featured in Appendix X: *Cannabis Track and Trace Enrollment Verification* and serves as proof of active enrollment and participation in this program. No Appendix X is available currently as this is still in concept phase.

Floor Plan (Building 1-3)

Summary

This Floor Plan provides details regarding each room of the proposed dispensary facility, including purpose, process, and dimensions. Security procedures for each room are detailed in the *Security Plan*.

No product is visible outside of the product dispensing area. To prevent unauthorized access by customers or other non-staff members, all cannabis product stored or contained outside the dispensing area (room) will be locked always (unless being accessed by staff members).

The proposed primary CF building is labelled as Building #1 equaling 9,600 sq. ft. on the far West edge of the parcel and is comprised of 9 designated areas on 1st floor and 10 designated areas on the 2nd floor, as listed below:

Building 1: Level 1 (West End of Lot)

1. ROOM 1: 1,625 sq. ft.; Nursery (Mothering Room).
2. ROOM 2: 1,125 sq. ft. Ancillary Propagation Room.
3. ROOM 3: 1,125 sq. ft. Ancillary Processing/Storage.
4. ROOM 4: 875 sq. ft. Ancillary Quality Control Storage.
5. ROOM 5: 875 sq. ft. Commercial Infusion Kitchen.
6. ROOM 6: 196 sq. ft. Office.
7. Remainder: 3,779 sq. ft. of Foyer, Access, Reception, and Supply Storage.

Level 2:

8. ROOM 8: 1040 sq. ft. Indoor/Veg Cycle Room.
9. ROOM 9: 1040 sq. ft. Indoor/Veg Cycle Room.
10. ROOM 10: 1040 sq. ft. Indoor/Veg Cycle Room.
11. ROOM 11: 1040 sq. ft. Indoor/Veg Cycle Room.
12. ROOM 12: 1040 sq. ft. Indoor/Veg Cycle Room.
13. ROOM 13: 1040 sq. ft. Indoor/Veg Cycle Room.
14. ROOM 14: 1040 sq. ft. Indoor/Veg Cycle Room.

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15. Remainder: 2320 sq. ft. of water storage, water filtration, access, stairwell access, and office.

The proposed primary CF building is labelled as Building #2 equaling 9,600 sq. ft. on the Central portion of the parcel and is comprised of 9 designated areas on 1st floor and 8 designated areas on the 2nd floor, as listed below:

Building 2: Level 1 (Central Portion of Lot)

1. ROOM 1: 875 sq. ft.; Volatile Manufacturing.
2. ROOM 2: 875 sq. ft.; Volatile Manufacturing.
3. ROOM 3: 875 sq. ft.; Volatile Manufacturing.
4. ROOM 4: 325 sq. ft. Ancillary Quarantine/Quality Control Storage.
5. ROOM 5: 875 sq. ft. Distribution/ Processing #1.
6. ROOM 6: 625 sq. ft. Processing #2.
7. ROOM 7: 625 sq. ft. Ancillary Cold Storage.
8. ROOM 8: 500 sq. ft. of Drying/Quarantine Storage.
9. ROOM 9: 196 sq. ft. Office.
10. Remainder: 3, 829 sq. ft. of Men's/Women's Locker/Restrooms, Access, and Lobby Reception/Receiving.

Level 2:

11. ROOM 8: 1000 sq. ft. Distribution #2.
12. ROOM 9: 750 sq. ft. Ancillary Product Storage.
13. ROOM 10: 750 sq. ft. Processing/Packaging #2.
14. ROOM 11: 625 sq. ft. Storage.
15. ROOM 12: 123 sq. ft. Broom Closet.
16. ROOM 13: 1500 sq. ft. Non-Volatile Manufacturing.
17. ROOM 14: 1500 sq. ft. Non-Volatile Manufacturing.
18. ROOM 15: 324 sq. ft. Electrical/Security.
19. ROOM 16: 450 sq. ft. Office.
20. Remainder: 2,578 sq. ft. of access, restroom and stairwell access.

The proposed primary CF building is labelled as Building #3 equaling 6,000 sq. ft. on the Eastern portion of the parcel and is comprised of 10 designated areas on 1st floor and 10 designated areas on the 2nd floor, as listed below:

Building 3: Level 1 (East End of Lot)

1. ROOM 1: 780 sq. ft. Office/Testing/Receiving.
2. ROOM 2: 507 sq. ft. Ancillary Product/Sample Storage.
3. ROOM 3: 877.5 sq. ft. Testing Laboratory.
4. ROOM 4: 226 sq. ft. Temporary Waste Storage Room.
5. ROOM 5: 348 sq. ft. Conference Room.
6. ROOM 7: 406 sq. ft. Breakroom/Mess/Hall.
7. ROOM 8: 203 sq. ft. Secured Storage.
8. ROOM 9: 196 sq. ft. Office #1.
9. ROOM 10: 490 sq. ft. Wholesale Storefront (Retail) Not intended for public use.

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10. Remainder: 1,987 sq. ft. of restroom, foyer, access, and stairwell access.

Level 2:

11. ROOM 11: 280 sq. ft. Secured Storage.
12. ROOM 12: 280 sq. ft. Secured Storage.
13. ROOM 13: 280 sq. ft. Secured Storage.
14. ROOM 14: 280 sq. ft. Secured Storage.
15. ROOM 15: 280 sq. ft. Secured Storage.
16. ROOM 16: 280 sq. ft. Secured Storage.
17. ROOM 17: 528 sq. ft. Secured Storage.
18. ROOM 18: 211.2 sq. ft. Secured Storage.
19. ROOM 19: 104 sq. ft. Office #2.
20. ROOM 20: 104 sq. ft. Office #3.
21. ROOM 21: 104 sq. ft. Office #4.
22. ROOM 22: 104 sq. ft. Office #5.
23. ROOM 23: 104 sq. ft. Office #6.
24. ROOM 24: 104 sq. ft. Office #7.
25. ROOM 25: 104 sq. ft. Office #8.
26. ROOM 26: 104 sq. ft. Office #9.
27. ROOM 27: 104 sq. ft. Secured Storage.
28. Remainder: 2,208 sq. ft. access, restrooms, and stairwell access.

**Outdoor Secured Chemical Storage Featured on East End of Lot.

Energy Use Offset Measures

The proposed CF employees the following energy conservation measures:

1. Green Building Code Standard.
2. Solar Power Supplemental.
3. Grid Supply from the Scotia Co-generation Plant.

Odor Control Plan

Summary

Odor control involves two primary elements, active ventilation, and odor filtration. The applicant has developed an *Odor Control Plan* for the proposed CF. It features detailed odor control measures involving the following mechanisms and technologies, as provided below.

These mechanisms create a cannabis environment that involves absolutely no detectable odor from outside the facility, including anywhere on the site grounds. This diligence is performed to 1) enhance security and 2) maintain a healthy community environment.

Active Ventilation

The proposed CF features odor control measures involving the following mechanisms and technologies:

1. Active ventilation & Air purifier system: Applicant proposes use of an EverClear CM-11 commercial air cleaner that is designed to use a combination of high efficiency filtration and absorbent technology to handle both airborne contaminants and odor/vapor removal (*See attached spec sheet*).

The project will be supported by the EverClear CM-11 commercial air cleaner that is designed to use a combination of high efficiency filtration and absorbent technology to handle both airborne contaminants and odor/vapor removal (*See attached spec sheet*).

Air Quality Engineering, Inc: High performance particulate and vapor filtration solution; EverClear CM-11 commercial air cleaner.

Length 46 5/8", Width 22 5/8", Depth 19 9/16", Weight 125 lbs.

Secondary Containment

All secondary containment of finished product is positioned within an air sealed, actively ventilated room that further minimizes the risk of the exit of odors, both inside and outside of the proposed CF facility.

Operational Plan

The Operational Plan covers many aspects of the business, including location, organization, and a description of the Project's business Sponsor that includes its mission, vision, and values. It also includes a description of what is produced by the Project, including sales and marketing efforts.

Project Summary

The organization of the Project Sponsor, Portfolio Investment, Inc. is comprised of a single member, CLIENT NAME. The proposed CF will operate business activities from Monday thru Saturday, 6:00 am to 6:00 am for a 24-hour staff shift cycle of up to three (3) working shifts and will be open to the public during the hours of 9:00 a.m. and close at 5:00 p.m. Portfolio Investment, Inc is expected to employ up to fifty-five (55) persons total with up to thirty-one (31) staff members per shift of up to 8 hours each day. Staff will be screened via background checks and a thorough interview process. One working staff member will be the manager/caretaker.

The chain of custody of cannabis product will be tracked via the State's designated Track and Trace System to minimize the threat of theft or diversion. Customers will be screened, validated, and registered via a thorough process that complies with all state, county, and local regulations. Customer records will be acquired and handled only by qualified staff and retained in compliance with all State recordkeeping guidelines. All chemicals will be reported into the CERS database and stored in fully sealed containers within a secure area of the proposed CF and accessed only by authorized staff.

Business Organization

Portfolio Investment, Inc is a sole member Corporations operating under entity number 4089596 that features one member-manager. The member-manager is responsible for delegating primary activities pertinent to the organization's daily and future management.

Management Team

CLIENT NAME, Managing Member.

CLIENT NAME, Business Manager.

Overview

The Operations Plan of the proposed dispensary includes information regarding the following aspects of the proposed CF dispensary business:

- Member(s): CLIENT NAME, CEO; Chief Executive Officer.
- Days/hours of operation: The proposed CF will be open for the public Monday thru Saturday from 9:00 am to 5:00 pm and will run business hours on up to three shifts for each activity during the hours of:

Security Personnel

6:00 am- 2:00 pm

2:00 pm- 10:00 pm

10:00 pm- 6:00 am

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Manufacturing

- 6:00 am. to 2:00 pm.
- 2:00 pm to 10:00 pm.
- 10:00 pm- 6:00 am.

Infusion Kitchen:

- 6:00 am- 2:00 pm
- 2:00 pm-10:00 pm

Testing/Processing/Packaging/Distribution:

- 6:00 am- 2:00 pm
- 2:00 pm to 10:00 pm

Cultivation/Nursery:

- 9:00 pm- 5:00 am

Administrative:

- 9:00 am- 5:00 pm

- Staff shifts: The proposed CF will maintain up to three (3) Staff shifts during working hours. Each day involves up to thirty-one (31) staff members per shift to support all operations, including a manager/supervisor. The peak staff load will be met during peak working hours.
- Regulated chemicals storage: Storage and procedures regarding use of regulated chemicals at the proposed CF is documented in onsite SDS binders.
- Effluent discharge: Cultivation effluents are cycled through water filtration system, black/greywater processed through onsite septic system, other discharges are processed through Hazardous Materials waste facility.
- Staff screening process: All staff members are thoroughly screened for their qualifications, including professionalism, education, and business ethics. This includes a criminal background check. Detailed of the Staff Screening Process will be available via the company's internal hiring processes and procedures.
- Cannabis product tracking and inventory controls are documented in the *Cannabis Safety Program* below).
- Customer screening/registration/validation process: Customers are qualified for admission to the proposed CF via a detailed Customer Screening Process outlined in the Customer Intake Process, on Pg. 40 of this application.
- Customer record acquisition process: The customer records acquisition process is detailed in Customer Intake Process.
- Waste Management Plan. Creation and management of waste by the proposed CF is documented in the Contingency Plan section of this application.

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Business Description

The primary goal of Portfolio Investments, Inc. is, within the State of California, to conduct Agricultural activities and offer Management Services, within the State of California.

Mission

Portfolio Investment, Inc is a for-profit entity with the mission of stimulating the Rio Dell Community by promoting economic growth, skill employment opportunities, and reviving the City center.

Vision

Portfolio Investment, Inc visualizes a prosperous future for the City of Rio Dell through support of attracting new opportunities for residents and an opportunity for research and training for the professional cannabis industry.

Values

Portfolio Investment, Inc's values are founded on protecting local resources, sourcing local support, and offering opportunity to the community. Beyond this, MI, Inc. plans to foster prosperity for the community through its success and holds high regard to giving back to the community that fostered its success.

Days/Hours of Operation

The proposed facility hours will be operated Monday thru Saturday from 6:00 am to 6:00 am the following day. Except for the following holidays: New Years, Easter, Thanksgiving, and Christmas. Days and hours of operation are subject to change in the future. Any changes will be communicated to all pertinent jurisdictions within required time periods.

Staff Shifts

Security Personnel

6:00 am- 2:00 pm (Up to 2 persons/shift)
 2:00 pm- 10:00 pm (Up to 2 persons/shift)
 10:00 pm- 6:00 am (Up to 2 persons/shift)

Manufacturing

- 6:00 am. to 2:00 pm. (1 staff member/unit) = 3 staff.
 -2:00 pm to 10:00 pm. (1 staff member/unit) = 3 staff.
 -10:00 pm- 6:00 am. (1 staff member/unit) = 3 staff.

Infusion Kitchen:

6:00 am- 2:00 pm (Up to 4 staff/shift).
 2:00 pm-10:00 pm (Up to 4 staff/shift).

Testing/Processing/Packaging/Distribution:

6:00 am- 2:00 pm (Up to 10 staff total).
 2:00 pm to 10:00 pm (Up to 10 staff total).

Cultivation/Nursery:

9:00 pm- 5:00 am (Up to 3 staff).

Administrative:

-9:00 am- 5:00 pm (Up to 9 staff).

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Products & Services

Project Products

Each facility intends to provide a specific services or product including, not limited to:

Wholesale Nursery Stock, Flower Production, Testing Services, Infusion Products, Non-Volatile/Volatile Manufactured goods, and Distribution/Processing/Packaging support activities for licensed businesses.

Portfolio Investments would produce specialty agricultural cannabis and nursery stock to support the onsite cultivation of high-grade organically produced cannabis flower products that are tested and assured for quality. Cultivation byproducts of additional value would be transferred to licensed manufacturers (for the processing of extracts, concentrates, and topical products).

The primary designated use of the raw cannabis (flower) produced would be the treatment of customers with varying ailments and for recreational uses. Premium-grade cannabis can be consumed via multiple methods, including inhalation, ingestion, and dermal (topical) applications. Cannabis has proven to deliver positive efficacy for myriad ailments, conditions, and symptoms. Research is underway regarding additional benefits of cannabis.

Sales & Marketing

Portfolio Investments product would be distributed to cannabis consumers via wholesale distribution to retail dispensary locations. The quality, testing thresholds, and branding would target consumers who lead a Lifestyle of Health and Sustainability (LOHAS) and who prefer premium organically produced medicine.

Chain of Custody

Portfolio Investments adheres to a robust system of chain of custody for recordkeeping and sourcing potential contamination of seed/nursery product, flower product, trim, or value-added byproducts. This system would serve to verify consumer safety of products during cultivation, processing, distribution, and wholesale/retail sales.

Packaging

After testing and processing, products would be packaged per quality control standards and in tamper-proof packaging that does not appeal to minors. Products packaged in larger volumes would be distributed directly to consumers and retail outlets. Individual consumer labelling may be applied at the distributor or retailer level, after transfer of ownership in the chain of custody. If the business chooses to protect its branding through the Agricultural Commissioner, products would be individually packaged and labelled within the County of origin.

Distribution

Portfolio Investments will secure trading outlets for its products through existing/soon developed self-distribution networks. These distribution networks service retail dispensary outlets that possess licensure within their respective jurisdictions, as well as the State licensing platform under the BCC. The established and growing customer base has created a demand and fulfills the need for many cannabis products from multiple licensed suppliers within the State of California.

Track and Trace Standards

As per the Track and Trace provisions as of June 27th, 2017 under the Medical Adult Use Cannabis Regulation and Safety Act (MAUCRSA), Senate Bill 94.

Chapter 6.5. Unique Identifiers and Track and Trace

26067. (a) The department, in consultation with the bureau, shall establish a track and trace program for reporting the movement of cannabis and cannabis products throughout the distribution chain that utilizes a unique identifier pursuant to Section 26069, secure packaging, and can provide information that captures, at a minimum, all the following:

- (1) The licensee receiving the product.
- (2) The transaction dates.
- (3) The cultivator from which the product originates, including the associated unique identifier pursuant to Section 26069.

(b) (1) The department, in consultation with the State Board of Equalization, shall create an electronic database containing the electronic shipping manifests to facilitate the administration of the track and trace program, which shall include, but not be limited to, the following information:

- (A) The variety and quantity or weight of products shipped.
- (B) The estimated times of departure and arrival.
- (C) The variety and quantity or weight of products received.
- (D) The actual time of departure and arrival.
- (E) A categorization of the product.
- (F) The license number and the unique identifier pursuant to Section 26069 issued by the licensing authority for all licensees involved in the shipping process, including, but not limited to, cultivators, manufacturers, distributors, and dispensaries.

Transportation

All products would be transported through either the permitted cultivator to processing or distribution and/or via a licensed transporter to trading partners that are authorized to distribute cannabis products to end consumer outlets (when applicable). These transporters would be responsible for adhering to guidelines that involve (but are not limited to) permitting, weights and measures, packaging/packing/labeling, verification of packing and freight volumes, and liability insurance that covers product loss resulting from unintentional diversion or emergency.

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Transporters would be responsible for fulfilling contractual deadlines and ensuring delivery of products in a timely fashion to maintain positive standing with trading partners and protect the quality of a product that features a limited shelf life.

Prohibition of Onsite Consumption

Portfolio Investments has a strict policy of maintaining a “drug free workplace”. No onsite consumption will be highly enforced via internal signage and repeated staff safety training.

License Screening & Registration

All potential customers will be thoroughly screened to ensure their compliance with State, County, and local regulations. This screening process is as follows:

- Customer is received at secured entrance and I.D. is checked.
- Customer license status is verified with administrative clerk.
- Customer enters into a service agreement and is entered into the customer management and track & trace system(s).

Record Acquisition and Retention

Licensed business records are collected and reviewed by only qualified, vetted staff members. The acquisition and retention of all license records is described below.

Record Acquisition Process

The record acquisition process is as follows: Administrative clerk requests proper identification to review license status with the State cannabis licensing databases. Step two is the license information will be entered into the customer information management system.

Record Retention Policy

The record retention policy for cannabis related projects is a minimum of seven (7) years.

Program

The chain of custody of all cannabis product will be tracked via the State’s track and trace program. Safety and quality assurance measures will include batch testing by an independent, certified laboratory of all product sold to customer customers.

Summary

The Cannabis Safety Program (CSP) for the proposed CF includes processes to be implemented to ensure the physical and consumer safety of products entering the end consumer marketplace. The CSP should be a detailed program designed by the business in accordance with their practices that meet the Bureau of Cannabis Control’s regulatory goals.

Safety and Quality Assurance Procedure

Objectives

- Provide a safe environment for patrons, staff, and the public.
- Provide products that meet the regulatory safety and quality assurance standards.

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- Verify the legitimacy of all third-party vendors and products received.

Methods

- Inconspicuous advertising and signage.
- Security, on-going surveillance, and alarm system.
- Staff background check and safety training.
- Track and trace verification.
- Product testing verification.
- Packaging and labelling verification.

Chain of Custody

Step 1: Verify licensing and insurance of qualified vendor(s).

Step 2: Determine suppliers' methods and programs in accordance with Department of Consumer Affairs (DCA).

Step 3: Determine supply-chain scheduling.

Step 4: Negotiate contract for product(s).

Step 5: Verify product testing certification that meets consumer safety standards.

Step 6: Products delivered to secure receiving entrance.

Step 7: Manifests, inventory, and packaging/labelling verified by shipping/receiving department.

Step 8: Shipping/Receiving enters verified shipment into track and trace system.

Step 9: Imported product held in quarantine area temporarily before processed into facility.

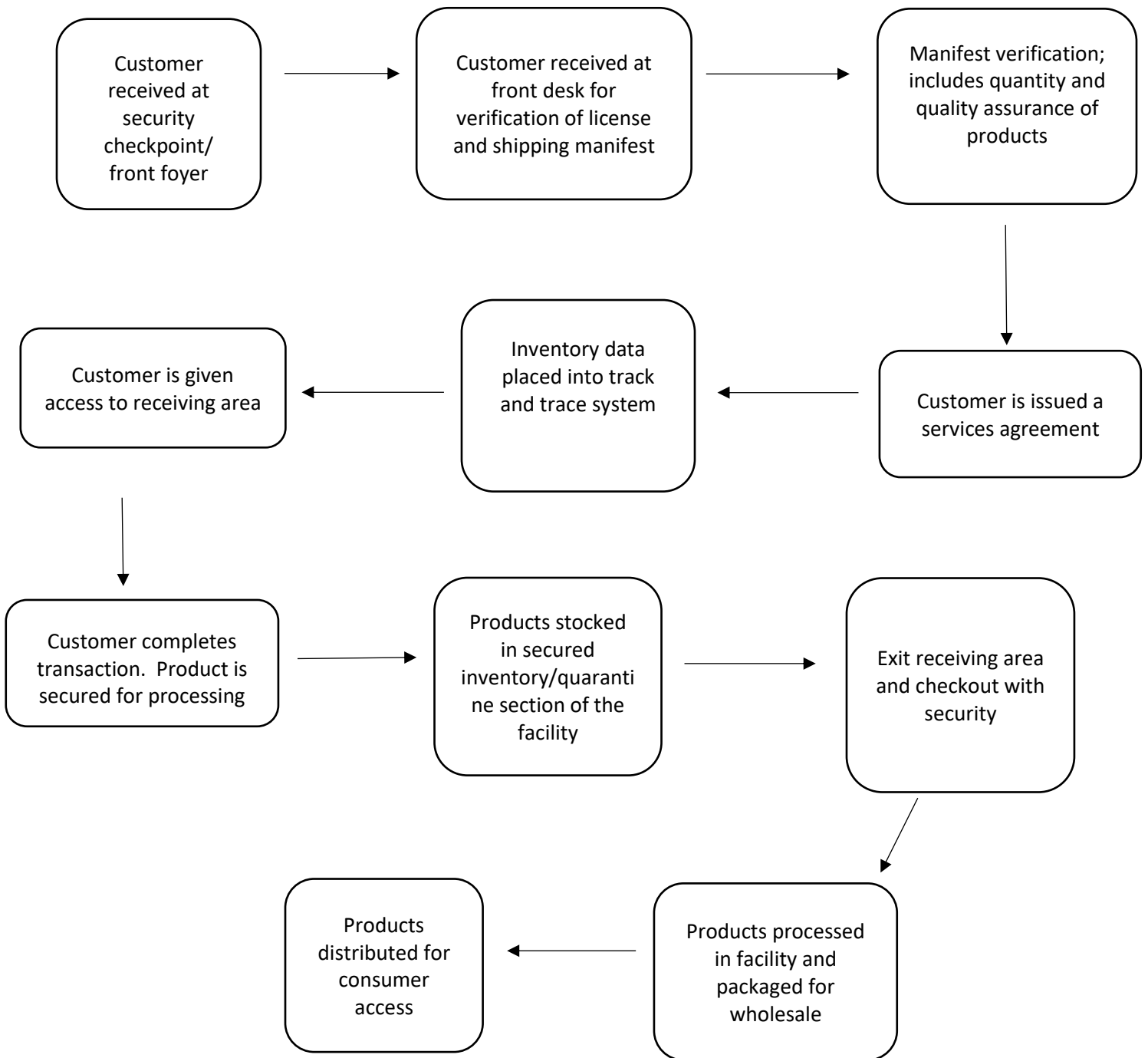
Cannabis Track and Trace Enrollment Verification

The Cannabis Track and Trace Enrollment Verification is featured in *Cannabis Track and Trace Enrollment Verification* section of this plan and serves as intent to comply with active enrollment and participation in this program.

Project sponsor would conduct verification of service providers and suppliers State License and County enrollment in the Track and Trace program and complies with all conditions and requirements of said enrollment.

Customer Intake Process

The path of qualified licenses holders through the facility provided on the following flow chart and image(s).



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Labor Plan

The labor plan addresses many aspects of product/inventory control, quality control, data management and security of this facility and its sensitive records. The company will adhere to robust standards and protocols that are required to reduce the risks associated with unlawful business activity.

Background

Summary

The Labor Plan covers many aspects of the workflow employed by the business from cultivation to harvest, dry, trim, cure, package, and assure the quality of cannabis products. Quality assurance efforts include sanitation, dust control, and environmental standards necessary for optimal processing.

As promulgated under various regulatory agencies, including but not limited to the Labor Commissioner (LC) and Wage and Hour Division (WHD), Employment Development Department (EDD), the Agricultural Labor Relations Board (ALRB), United States Department of Agriculture (USDA), the Food and Drug Administration (FDA), California Department of Food and Agriculture (CDFA), and are responsible for varying aspects of government labor laws, quality control, minimum wage and hours laws, administrative responsibilities, and health and safety regulations that govern processing and day labor activities related to Agricultural industries.

Project Details

Commercial activities undergo a common process flow that involves verification of suppliers' license status, verification of product lab results, to product purchasing, track and trace verification, distribution to transportation chain, product intake verification (inventory), and end consumer sales.

Cultivation activities undergo a common process flow that involves cultivation, to harvest, drying, to testing, grading/sorting, curing, to testing, packaging, to testing again (distributor level), and end sales. This is in efforts to ensure robust quality control; the business would employ stringent grading and sorting of cannabis product during harvest to eliminate any contaminated product from end supply.

Project Processing Environment

Processing environments are broken up into different segments within Building #1 and #2 and include different functions such as quarantine, drying/curing, processing/packaging, and distribution. All stages will include chain of custody protocol to induce quality control practices and account for liability of product.

It is expected that structures for this project would support a maximum of fifty-five (55) people during peak processing activities. Applicant may propose additional structural development to accommodate enhanced operational needs.

Housing

No housing is provided for this project at this time.

Any housing provided to employees for this Project will be subject to CCR regulations found in the *Source Guide for Federal & State Requirement for Employees and Migrant Housing* and the *Department of Community Housing & Development*.

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Administrative

Administrative elements of the Project include payroll, recording and reporting, chain of custody, safety procedures and protocols, product safety materials, labor and subcontractor issues, and quality assurance/control of product.

Labor Management

The primary organization currently responsible for the recordkeeping of employees (both seasonal and permanent) would be Portfolio Investments, Inc. All records maintained by Portfolio Investments Inc. would be made available upon request.

The organization has considered payroll options for peak times of the season during which employment periods would be up to several months in duration (particularly during the harvesting, processing, and packaging stages of cultivation). An outside entity may be responsible for soliciting, recruiting, and hiring employees.

The designated entity is responsible for ensuring property, business, and workplace compliance under the guidelines of the following departments:

- Bureau of Medical Marijuana Regulation (BMCR).
- California Department of Food & Agriculture (CDFA).
- County Agriculture Commissioner (CAC).
- County Planning Department (CPD)/Community Planning (CP)/Development Department (DD).
- Department of Industrial Relations (DIR).
- Department of Labor, Wage, and Hour Division (DL-WHD).
- Department of Pesticide Regulation (DPR).
- National & California Agricultural Labor Relations Board (NALRB/CALRB).
- Occupational Safety and Health Administration (OSHA).
- U.S. Department of Labor (US-DOL).

Recording & Reporting

All employee records for hours worked and reported would be kept onsite or via a payroll recordkeeping center and submitted to the managing payroll department to ensure timely reporting. Requests for review of payroll records would be the sole responsibility of the managing human resources agent (upon request and under certain lawful circumstances).

Performance Review Reports

New hire employees will undergo a 90-day probationary period and be evaluation once upon the 90-day mark and 6 months beyond that timeframe. Long term employees will be evaluated one year beyond their 6-month evaluation to determine productivity, goals, future or current roles in the organization, and areas for growth.

Staff Screening

All staff employed at the proposed CF will undergo the following:

1. Job training and education (including a review of laws, regulations, and policy at the proposed CF).
2. Background checks.

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3. Contact with Former Employers and/or Recommendations.

Background Investigation Results

Company policy requires background investigations on staff, officers, directors, and owners. Findings that include felony charges because of theft, sexual assault, and other violent offenses may be cause for denial of employment and/or ownership.

Quality Assurance & Control of Product

Quality assurance efforts encompass sanitation, climate control, dust control, and a variety of environmental standards. Quality control measures include monitoring, testing, harvesting, drying, curing, grading, sorting, packaging, secure storage, and distribution procedures.

In 2011, the Food and Drug Administration tasked the U.S. Department of Agriculture (USDA) to co-create with the U.S. Department of Health and Human Services (USDHHS) and the Center for Food Safety and Applied Nutrition (CFSAN) a program to implement Good Agricultural Practices (GAPs) and Good Handling Practices (GHPs). The goal was to mitigate food safety hazards and set standards and management regulations for processing facilities to ensure quality and consumer safety of agricultural products when handled in processing environments.

Found in the April 2011 *Guide to Minimize Microbial Food and Safety Hazards for Fresh Fruit and Vegetables* (authored by the USDA, USDHHS, and CFSAN) is discussion about the fundamental procedures that should be developed and implemented. This document features a list of principles applied to the workplace in efforts to meet these standards and is as follows:

- Accountability for product quality.
- Controls for workplace sanitation.
- Employee hygiene.
- Minimization of microbial exposures.
- Operating procedures.
- Packaging procedures and protocols.

Chain of Custody

Agricultural businesses must adhere to a rigorous chain of custody system for product management and the identification of contamination in all raw and finished products.

Monitoring

Pre/post-harvest workflow would be monitored on a predetermined schedule and involve documentation of the condition of the product during its active stage of monitoring.

Harvesting

During harvest, a labor crew would be required to assist with light physical labor, including walking, crouching, lifting, and some climbing.

Testing Procedure

All product testing would be conducted by an approved (certified) third-party laboratory. This would encompass testing for potency and purity, including the presence of pesticides, fungicides, and harmful micro biologics.

Drying/Curing

Product would be harvested at maturity and dried and cured in a climate-controlled environment. The primary equipment used would include dehumidifiers, fans, and heaters.

Grading/Sorting

Products would be graded based on testing results, maturity, and specific intended use (flower, manufacturing of extracts, concentrates, topical products, etc.)

Processing

Product would be harvested, trimmed, dried, and cured in a manner best suited to the specific environmental factors of the crop. This would include both visual inspections by expert cultivators and data collection and analysis (via automated sensors).

Packaging

Packaging would adhere to the guidelines for package type, quantity/weights, warning labels, and stamping procedures.

Dosage Determination and Testing Procedure

- customer **titration** guidelines (dosing recommendations).
- **testing** for major “active agents” (cannabinoids and terpenes).

Health & Safety

The first response emergency contact phone number is 9-1-1. Hospitals are Redwood Memorial Hospital at 707-725-3361(Fortuna) and St. Joseph Hospital at 707-445-8121 (Eureka). The American Association of Poison Control Centers (AAPCC) can be reached at 800-222-1222.

Job Hazard Analysis

Labor duties would vary throughout the harvesting, drying, processing, and packaging stages of the operation. With each task, an analysis would be conducted to identify potential hazards associated with a task, including weather conditions, the physical aptitude of employees, tools utilized, and potential exposure to chemicals and other substances. Identification of these hazards is intended to mitigate potential job hazards and help ensure employee adherence to safety practices.

Injury Illness Prevention Plan

It is required by the DIR that every employer shall establish, implement, and maintain an effective Injury and Illness Prevention Plan (IIPP).

Components of an IIPP include:

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- Employee compliance with safe and healthy work practices.
- Investigation of injuries and/or illnesses.
- Procedures for correction of unsafe/unhealthy conditions, work practices, and/or procedures.
- Procedures to identify and evaluate workplace hazards.
- Responsible person(s) and contact information.
- Safety training.
- System for communication with employees.
- Thorough safety program recordkeeping and document retention practices.

Heat Illness Prevention Plan

Written protocols regarding heat illness prevention would be available to employers, managers, supervisors, and employees regarding how to prevent and handle heat illness incidents.

To prevent heat illness to employees in the field, several factors must be considered:

- Ambient temperature (measured via thermometer or weather report).
- Crew size.
- Excessive clothing.
- Other relevant exposures.
- Presence of personal protective equipment or additional sources of heat.
- Work shift duration.

The following heat illness factors would be considered:

- Accessibility of drinking water.
- Accessibility of shade (via protective structures).
- Periodic rest breaks.
- Reminders to employees to remain hydrated.

Hazard Communication Policies

Hazard communication is important to ensure the safety of all onsite employees, contractors, and subcontractors. Potential and known hazards would be made clear prior to conducting tasks and activities. Implementing this procedure is important to ensure that employees, contractors, and subcontractors are informed about the relevant risks associated with certain onsite tasks and the reduction of liabilities against the employer for improper use of equipment, machinery, and tools.

Emergency Procedures

Emergency procedures include the availability of eye washing stations and detailed procedures for dealing with chemical spills. In the event of an emergency, certain protocols would be developed and followed regarding fire evacuation plans, earthquake safety, and other emergency scenarios.

Chemical Handling

Any input products used onsite would be accompanied by MSDS and Chemical Inventory Lists that would be available to inspectors and employees and maintained onsite.

In the event of emergency spills, call 9-1-1 and then report to the Office of Environmental Safety (OES) and California State Warning Center (CSWC) at 800-852-7550 or 916-845-8911 and identify proper steps to isolate the incident and cleanup.

Eye Washing Station

Often, chemicals used onsite provide MSDS sheets that indicate the need for applicators to utilize an eye washing station after exposure. The eye washing station must be positioned within 200' of the cultivation area and any areas where chemicals, fertilizers, or pesticides would be used or administered for various applications.

Employee Accident Policies

An investigation would be conducted to determine next steps.

The company adheres to protocols for employee accident reporting. The manager is responsible for documenting any onsite incidents using *Form 5020*, including:

- Address of accident/event site.
- Description of accident/event and if the accident scene/instrumentation has been altered.
- Employer's name, address, and telephone number.
- Law enforcement agencies present at the accident/event site.
- Location of medical treatment.
- Name and address of injured employee(s).
- Name and job title of reporting party.
- Name of contact person at accident/event site.
- Nature of injuries.
- Time and date of accident/event.

Accidents need to be reported immediately to Cal/OSHA in Redding at 530-224-4743.

Contact the business' medical provider, the employee's designated medical provider, or 9-1-1, depending on the severity of the incident. Follow up with contact to the California Division of Workers' Compensation (CDWC).

Personal Protective Equipment Policies

Application of pesticides and fungicides requires personal protective equipment, including respirators, Tyvek suits, and gloves. It is the applicator's responsibility to ensure safety in the field. The farm manager is responsible for furnishing, applying, and informing of the appropriate uses associated with such products.

Applicators are required to acquire an Operator ID through the Agriculture Commissioner via the Pesticide Handling Training Program (PHTP). This would involve training applicators about labels, cautions, and recommended Personal Protective Equipment (PPE). Pesticide PPE would be stored onsite and separately from fertilizers, pesticides, and fungicides. Restricted Entry Intervals (REI) would be imposed and posted after application of chemicals to prevent exposures.

Additional PPE provided onsite for any processing labor would include access to gloves and dust masks by employees during drying, processing, and packaging.

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It is the responsibility of managers/supervisors to ensure that PPE policies are followed during appropriate working conditions. In the event of product application by an employee, the applicator must be designated an operator ID and is required to employ the proper PPE during application, as well as abide by label warnings in the event of exposure, poisoning, or a spill.

State law may require processors to employ PPE equipment for the duration of their shifts to ensure no exposure to and/or contamination from a product.

All laborers must be made aware of REI and tangible notification of the recommended REI after the application of pesticides, fungicides, and other chemical applications.

Occupancy & Structural Guidelines

The general environments in which laborers would work include the field and within the proposed processing building. The environments in which any agricultural activity would occur would follow all guidelines (per agricultural and labor oversight agencies). The facility would need to meet commercial building standards in accordance with California Building Codes and would be made compliant with the American with Disabilities Act (ADA) and Architectural Barriers Act (ABA).

Any housings, buildings, and structures would be subject to California Building Code (CBC), including possible permitting requirements, inspections, and certificate(s) of occupancy. Additionally, specific exemptions exist that pertain to agricultural standards under the Occupational Safety and Health Administration (OSHA) and in conformance with the Occupational Safety and Health Guidelines (OSHG) (unless the Project meets certain exemptions, such as being a family-owned and operated business, does not offer temporary labor housing, or employs fewer than 10 employees at any given time). In other such cases, the site would need to comply with OSHA Guidelines pertaining to agricultural employment.

Notification of Occupancy & Terms

As per the DIR and the US-DOL, all notices and labor postings would be provided and visible to all onsite employees. Any notification of occupancy status and terms of employee occupancy would be posted in compliance with all local, State, and Federal laws governing agricultural employers under the following regulatory bodies and regulations:

- California Agricultural Labor Relations Act (CALRA).
- California Occupational Safety & Health Administration (Cal/OSHA).
- Department of Industrial Relations (DIR).
- State and National Agricultural Labor Relations Board (CLRB & NLRB).
- U.S. Department of Labor (US-DOL).

Maintenance of Sanitary Facility

To help ensure the quality of finished product, a clean working environment would be maintained during the drying, curing, processing, and packaging stages of cultivation. Among other benefits, this would prevent potential contamination between crop batches. All product would be batch tested prior to processing. In the event of a recall, it would be assured that each batch or variety has not become contaminated during these stages within the processing facility.

Dust Control Measures

In the event of high dust levels, all processing environments would maintain clean working areas to prevent potential dust exposure to employees.

To ensure product quality and to prevent potential contamination of processing environments, certain dust control measures would be implemented. These measures would include maintenance of sanitary working environments and possible implementation of air filtration systems.

Water Access & Facilities

The Project site would provide employees with access to the following facilities/resources within reasonable proximity to work areas:

- Handwashing facilities (individual units/restrooms/locker rooms).
- Onsite potable water (break room(s)).
- Restroom facilities (restrooms on each level of each facility).

Security Plan

The Project's *Security Plan* includes product security, inventory management, and diversion prevention. Pertinent regulatory language includes the following:

Assembly Bill 604 (AB-604), Article 3, Mandatory Commercial Registration, § 26040 (5): "Security requirements, including, but not limited to, procedures for limiting access to facilities and for the screening of employees. The department shall require all registrants to maintain an accurate roster of any employee's name, date of birth, and relevant identifying information, which shall be available for inspection by the department or State or local law enforcement upon demand."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(3): "Operating and inventory control procedures to ensure security and prevent diversion."

AB-604, Article 3, Mandatory Commercial Registration, § 26046 (a)(4): "Detailed operating procedures for the proposed facility, which shall include, but not be limited to, provisions for facility and operational security, prevention of diversion, employee screening, storage of cannabis, personnel policies, and recordkeeping procedures."

Summary

The Security Plan details efforts to prevent loss and diversion of cannabis products, ensure safety, and implementation of a tracking system to account for product(s) throughout the chain of distribution. Security features of the proposed CF will reduce criminal activities and would include the following measures: Exterior lighting, alarms, security cameras, and optional hardening measures.

Criminal Activity Reward Reduction Measures

Policies and practices for securing cannabis products, cash, customer data, equipment, computers, and other valuables.

Project Specific Details:

In efforts to mitigate criminal activity to surrounding community, the project will adhere to the following standards:

- Inconspicuous signage representing the storefront facility's nature of business.
- Ongoing surveillance.
- Alarm system to protect the facility.
- Perimeter fencing and secured access.
- Identification verification.
- Incentivize community and employees of neighborhood watch security through incentive bonuses, commemoration, and awards.
- Contribute to local police force for additional security implementation monitoring program.

Project Specific Security

The proposed CF features security measures involving the following processes/mechanisms:

1. Customer verification checkpoint: Customers will be received at initial security checkpoint. Customers will then be received at front desk for verification of identification and/or licensure.
2. Video cameras: The proposed CF employs twenty (20) video cameras capturing continuous video during continuous hours. Recordings are archived and retained for a minimum of thirty (30) days.
3. Alarms: Alarms system will be designed and installed for the facility serviced by Advanced Security Systems. Together, these alarms would trigger a security process that, when necessary, contacts local law enforcement to prevent theft and diversion of product.

Hardening measures: The facility is currently equipped with one metal doorway to the delivery entrance and plans to implement additional hardening measures on one (1) entryway to service entrance, one (1) entryway to back entrance, and deadbolts on all access doors. The premises sponsor proposes to complete secure rod iron fencing around property perimeter of eight (8) feet in height.

Measures of Security

Several security measures would be involved in the comprehensive protection of cannabis products. These include exterior lighting, alarms, cameras and video capture, and the hardening of doors, windows, and fencing.

Security measures for this project would encompass, at a minimum:

- Locked containment for product storage (to be developed).
- Surveillance and monitoring systems (to be developed as per the State's requirements).
- Alarm System.
- Secured entry into working part of the facility (Building #1 and #2)

Security Map

Includes exterior lighting, alarms, security cameras, and any hardening measures (See Floor Plan/Plot Plan).

Security Cameras

The proposed CF features twenty (20) security cameras in the locations displayed in the Security Map above. All footage is retained for a maximum of 30 days.

Points of Security (Proposed Room Layout)

Floor 1:

- Doors & Windows (Alarm Triggers Stay & Away)
- Front Parking Area (Camera)
- Southwest Boundary of Building (Motion Sensor)
- Back Patio Area (Camera & Motion Sensor Light)
- Ramp Out of Front Entrance (Camera & Motion Sensor Light)
- Delivery Entrance Area/Kitchen Storage (Camera & Motion Sensor Light)

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- Front Foyer (2 Cameras)
- Customer Intake Area (Camera)
- Product Sales Counter (2 Cameras)
- Juice Bar Area (2 Cameras)
- Bar (Camera Out)
- Conference Meeting/Ancillary Retail Room (2 Cameras)
- Clone Storage/Edible Manufacturing Room (2 Cameras)
- Bar Storage Area (Camera)

Floor 2:

- Entry up to Second Floor (Camera)
- Manager's Office/Vendor Intake Room (Camera)
- Second Floor Outside (Camera)

Alarms

The proposed CF dispensary features an alarm system that is in perpetual operation (24 hours a day, seven days a week). The alarm involves Advanced Security Systems. The alarm includes local law enforcement notification.

Exterior Lighting

The proposed facility features exterior lighting at the entrance, the southwest exterior wall, the back patio, and on the north interior wall of the storage room, as shown on the Security Map above.

Hardening Measures

The proposed facility contains one (1) gated door, with proposal to install an additional three (3) metal doors, and windows that could be hardened with metal bars with the exception for one (1) un-barred window that can be used as an emergency exits. The windows will be connected to the Advanced Security Systems, as shown on the enclosed Security Floor Plan. The premises will be secured entirely by an eight-foot rod-iron perimeter fence with secured entry points and will be fully enclosed in the future.

Storage

The Storage Room (see *Floor Plan*) of the proposed facility will feature multiple security measures, including locks, video surveillance, and secondary secured containment for the storage of all cannabis product not on display in the dispensing room. During non-business hours, all cannabis products will be stored in secondary containment within the secure Storage Room(s).

Storage Room Features

The Storage Room(s) features the following security measures:

- Video surveillance and recording.
- Commercial locks connected to central alarm station at all entry points.
- Restricted Access Entry Keypad.

Inventory Management

A rigorous system of recordkeeping and reporting would be facilitated to adhere to the State's Track and Trace requirements of all cannabis products. This would include (but not be limited to) flower, trim, edibles, concentrates, topicals, and stems to ensure zero diversion of product throughout processing.

To prevent loss and diversion, all cannabis products would be stored under locked containment during the drying, curing, and packaging phases of processing. Products would also be subject to conformance with a checks and balances system to ensure the prevention of unintentional diversion.

Prevention of Diversion

The most vulnerable stage of product security is transit to retail outlets. The best way to ensure product safety and prevention of diversion and loss is to maintain adequate chain of custody records via the Agricultural Commissioner's (SICPA) and the State's (METRC) Track and Trace System.

All parties participating in the supply chain would be informed of expected delivery quantities via packing slips, shipping manifests, and Trace an Trace. Additional measures include: tamper-evident seals, verification of credibility, and product liability coverage.

Cultivation Plan

The Cultivation Plan adheres to robust standards promulgated under the DPR and regulated under the CDFA, and in accordance with DCA's consumer standards maintained by the Department of Public Health (DPH).

In preparation for future certification related to organically produced product, the Cultivation Plan also follows National Organic Program (NOP) standards. The input guidelines established by the DPR are in accordance with certification regarding organically produced product requirements and follow a whole-farm BMP plan for management of land, crops, and end products.

Summary

The Project proposes 7,280 sq. ft. of Type 2A of indoor cultivation operating on cycles of vegetation/flowering and 2,750 sq. ft of Type 4 nursery activities in the form of a total of 9 designated rooms that would be serviced entirely by artificial light. Indoor cultivation activity will run up to three rooms of flowering at a time for a total of 3,120 sq. ft. of space to be harvested simultaneously (see schedule below).

Water for the Project would be sourced from one (1) interior water storage tank and one (1) water filtration tank system supplied by City of Rio Dell Municipal Water.

Cultivation Schedule

The following table details the annual cultivation schedule, comprised of up to forty-five (45) harvests per year, with breakdown by area. Water figures are indicated in gallons.

Area	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Room 1-3	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Veg/Blm	Blm	Blm/Veg	Blm	Blm/Veg	Blm	Blm
Room 4-6	Blm/Veg	Blm	Blm	Veg/Blm	Blm	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Veg/Blm	Blm
Room 7-9	Blm	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Veg/Blm	Blm	Blm/Veg	Blm	Blm	Veg/Blm
Nursery	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg
Propagation	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg	Veg
Water	4500	4500	4500	4500	4500	4500	4500	4500	4500	4500	4500	4500

Water Resources

Water for the proposed cultivation Project would be sourced from City of Rio Dell Municipal Water to supply the cultivation activities.

To mitigate runoff from cultivation activities, water reclamation and filtration and special irrigation techniques would be employed.

Irrigation System

Applicant will design and implementation of a water conservation irrigation control system.

Emergency Water Plan

In the event of a water emergency, the proposed Project will feature a backup groundwater well to supply the cultivation and building's domestic activities.

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Cultivation/Processing Equipment

The cultivation facility will be supported by six (6) 1000-watt HPS Gavita systems/room (totaling forty-two (42) systems). Each room will also feature a filtered air intake system, and water runoff will be collected through a floor drainage system to be recovered in the closed loop water filtration system. Odor control will be implemented through the EverClear CM-11 System proposed in the Inventory and the Odor control portion of this plan.

Waste Management Plan (Soil/Green Material)

The facility proposes to produce manufactured goods and infusion products. As a result, there will be minimal waste generated that will need to be disposed of as per the Bureau of Medical Cannabis Regulations proposed rulemaking regarding handling waste product. The proposed CF will also generate green waste in the cultivation or processing of cannabis products, waste produced as a result will be held in a secured onsite compost area and disposed at a licensed offsite facility.

Soil used for the operation will be disposed of via an onsite contained leaching and reclamation system adjacent to the outdoor compost holding area. The maximum soil to be stored at any given time equals to 672 cubic feet, which is the approximate total soil used for the operation within the indoor cultivation zone. Soil from the nursery will not be as easily or quickly spent due to the prolonged life cycle of the mothering stock.

Any waste produced will be documented and managed according to the CF's *Waste Management Plan*, available in the Waste Management Plan stated in this application.

Waste Management Plan

In accordance with specifications provided by the DEH and the California Unified Program Act (CUPA)—to meet the business plan criteria required to ensure compliance with regulations that are intended to protect public health and the environment—this section addresses water production (including well construction) and the handling of onsite wastewater, solid waste, and hazardous materials.

Summary

The Waste Management Plan addresses onsite wastewater and hazardous wastes, solid waste removal and recycling, water production and well construction, hazardous materials handling, agricultural product storage, and chemical spill procedures and handling guidelines.

Material Safety Data Sheets (MSDS) for all fertilizers, soil amendments, and pesticides would be made available onsite. If requested, all equipment maintenance performed onsite would be listed/described. Per California Department of Food and Agriculture (CDFA) regulations, chemicals would be stored separately from fuels, oils, and similar products. Fertilizers and pesticides, specifically, would be stored in locked containment within an outdoor structure.

Chemical spills would be handled and reported per directions in the Project's Chemical Spill Procedure.

Common waste products that would be used or generated onsite include:

- Fertilizers.
- Fuels.
- Household chemicals.
- Human refuse.
- Human waste.
- Pesticides/herbicides/fungicides.

To ensure mitigation of potential pollution of grounds, nearby waterways, and ecological habitats, the proper treatment, storage, removal, and overall security of potentially polluting products would be ensured via use of dedicated areas and containers that are covered and watertight.

Project Waste Management

The sections below address the Project-specific details, impacts, and procedures for handling waste products.

Project Specific Details

Project location is proposed to support two (2) 9,600 sq. ft. buildings and one (1) 6,000 sq. ft. building, and is currently sits as a vacant lot off the main stretch of 101 Northbound, in Rio Dell, CA. Wastes generated by this project include but are not limited to, human waste, human refuse, raw cannabis wastes as a by-product of manufacturing and Edible production operations. The use of cleaning agents and products will be minimal. Chemicals employed are documented in the *Gases and Cleaners Inventory system* kept on site, and with supporting *Safety Data Sheets onsite*.

Waste Management Standards

Pursuant to the Occupational Health and Safety Administration's; General Environmental Controls pertaining to Sanitation. §1910.141(a)(2):

Non-water carriage toilet facility, means a toilet facility not connected to a sewer.

Number of employees means, unless otherwise specified, the maximum number of employees present at any one time on a regular shift.

Personal service room, means a room used for activities not directly connected with the production or service function performed by the establishment. Such activities include, but are not limited to, first-aid, medical services, dressing, showering, toilet use, washing, and eating.

Potable water means water that meets the standards for drinking purposes of the State or local authority having authority, or water that meets the quality standards prescribed by the U.S. Environmental Protection Agency's National Primary Drinking Water Regulations (40 CFR 141).

Toilet facility, means a fixture maintained within a toilet room for defecation or urination, or both.

Toilet room, means a room maintained within or on the premises of any place of employment, containing toilet facilities for use by employees.

Toxic material means a material in concentration or amount which exceeds the applicable limit established by a standard, such as 1910.1000 and 1910.1001 or, in the absence of an applicable standard, which is of such toxicity to constitute a recognized hazard that is causing or is likely to cause death or serious physical harm.

Urinal means a toilet facility maintained within a toilet room for the sole purpose of urination.

Water closet means a toilet facility maintained within a toilet room for both defecation and urination and which is flushed with water.

Wet process means any process or operation in a workroom which normally results in surfaces upon which employees may walk or stand becoming wet.

As per the CCR, Title 8, § 3457, which addresses field sanitation standards, the cultivation site is required to provide access to waste facilities within one-quarter (1/4) mile or a five (5) minute walk, whichever is shorter.

If the primary septic system is not within this accessibility threshold, a portable facility or pit privy may be provided in lieu of septic to support waste activities. The standards for portable waste facilities are as follow:

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- Toilet facilities: Shall be always operational, maintained in a clean and sanitary condition, and kept in good repair. Records of service and maintenance shall be retained for two years.
- Chemical toilet wastewater tank: Shall be constructed of durable, easily cleanable material and have a minimum tank capacity of forty (40) gallons. Construction shall prevent splashing on the occupant, field, or road.
- Chemical tanks: Contents shall be disposed of by draining or pumping into a sanitary sewer, an approved septic tank of sufficient capacity, a suitably sized and constructed holding tank approved by the local health department, or any other method approved by the local health department.
- Privies: Shall be moved to a new site or taken out of service when the pit is filled within two (2) feet of the adjacent ground surface. When the privy is moved, the pit contents will be covered with at least two (2) feet of well-compacted dirt.

Organic Waste Handling

As per Section 42649.8(c) of Public Resources Code any waste composed of or containing unusable cannabis leaves or flowers will be treated as organic waste, and managed in compliance with Division 30, Part 3, Chapters 12.8, 12.9 and 13.1 of the Public Resources Code.

Project facility will initially utilize proper waste hauling efforts to eradicate plant waste from the facility and will adhere to the following standards:

- The facility will use active compost on-site under applicable standards for offsite distribution.

For any cannabis waste collected by a permitted waste hauler, documentation regarding the name, address, phone, and contact person of the provider will be sent to CDFA. A receipt will be logged identifying the date and time of the pick-up along with a certified weight ticket.

Any used soil kept for reuse will be stored in enclosed containment or will be properly stored off-ground on a tarp or in secure containers with proper covering. During the off-season reusable cultivation materials are collected and stored where they will not enter a waterway or create a nuisance. All packaging from tools, amendments, soils, and fertilizers will be kept in secure trash storage and properly discarded. Garbage will be transported to the Eel River Recovery in Fortuna, CA on a weekly basis. Recycling will be transported to Eel River Recovery monthly or more frequently as needed.

The State Water Quality Control Board's General Board Order requires the operator to dispose of organic materials or reused spent growth medium (e.g., soil and other organic media) in a manner that prevents discharge of soil and residual nutrients and chemicals to any nearby waterways. Spent growth medium shall be covered with plastic sheeting or stored in water tight dumpsters prior to proper disposal or reuse. Spent growth medium may include incorporation into garden beds or spreading on a stable surface and revegetating the surface with native plants. Erosion control techniques will be used as needed, for any reused or stored spent growth medium to prevent polluted runoff.

Along with other composted vegetation matter, cannabis waste, will be tilled or chipped for recycling and composted in a secure designated composting area, in compliance with Title 14 of the California Code of Regulations at Division 7, Chapter 3.1 (commencing with

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Section 17850). If any material is placed in a secure waste receptacle, it will be kept in an area where public access is prohibited.

Registration requirements for Compost Permits would be excluded from the site management plan due to exemptions including but not limited to:

- Handling agricultural material, derived from an agricultural site, that returns a similar amount of the material produced to that same agricultural site, or an agricultural site owned or leased by the owner, parent, or subsidiary of the composting activity. It is noted that no more than an incidental amount of up to 1,000 cubic yards of compost product may be given away or sold annually.
- The use of compostable material and/or digestate for gardening or landscaping on a parcel of land 5 acres or less in size.
- Composting green material, agricultural material, food material, and vegetative food material, alone or in combination, is an excluded activity if the total amount of feedstock and compost on-site at any one time does not exceed 100 cubic yards and 750 square feet.

Track and Trace

When cannabis waste has been identified it will be weighed and then logged into the state track-and-trace system, prior to preparation for composting or disposal. The system will be reviewed and reconciled periodically to ensure accuracy.

Irrigation/Effluent Control

Plants are watered using irrigation control system at appropriate agronomic rates to prevent excessive runoff. Runoff will cycle through the interior two (2) stage water filtration system housed next to the nutrient water storage.

Effluent Waste Management

The premises have an onsite septic system connected to each of the three facilities and is specified to support greywater and black water. Wastewater will be disposed through three (3) 90' leach lines supported by a 3500-gallon tank reserve. Temporary septic containment will be proposed to support Phase .5 in the form of a modular restroom and to support waste containment while under construction for Phase 1 & 2.

As per the CCR, Title 8, § 3457, which addresses field sanitation standards, the cultivation site is required to provide access to waste facilities within one-quarter (1/4) mile or a five (5) minute walk, whichever is shorter.

Where the septic system is not within this accessibility threshold, a portable facility will be provided in lieu of septic to support waste activities. The standards for portable waste facilities will be followed for toilets, wastewater, and chemical tanks.

Toilet facilities will always be operational, maintained in a clean and sanitary condition, and kept in good repair. Records of service and maintenance shall be retained for two years.

Chemical toilet wastewater tank will always be constructed of durable, easily cleanable material and have a minimum tank capacity of forty (40) gallons. Construction shall prevent splashing on the occupant, field, or road.

When chemical tanks are used, contents shall be disposed of by draining or pumping into a sanitary sewer, an approved septic tank of sufficient capacity, a suitably sized and constructed holding tank, or any other method approved by the local health department.

Hazardous Waste Handling

The EPA defines a hazardous waste as a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment. Hazardous waste is generated from many sources, ranging from industrial manufacturing process wastes to batteries and may come in many forms, including liquids, solids gases, and sludges.

In the event the site produces hazardous waste, it will be managed in compliance with all state and local hazardous waste statutes and regulations.

Reporting Thresholds of products that fall within the within the Federal Hazard Communication Standard (HCS), Physical or Health categories featuring twenty-four (24) sub-categories that require reporting if the volume of product stored meets or exceeds the following thresholds:

- 55 gallons, 500 pounds, or 200 cubic feet (for 30 days or more at any time during a year) of hazardous material, including hazardous waste
- Category I or II pesticides
- Explosives
- Extremely hazardous substances (above the planning threshold)

Safety Data Sheets (SDS) for all chemicals, fertilizers, and amendments would be furnished and made available onsite. Compressed gases, cleaners, and sanitizers are stored in the quantities outlined in the site's chemicals inventory list that is maintained onsite.

Operators are required under California's Certified Unified Program Agency (CUPA) guidelines to list/describe all equipment maintenance performed on site (including changing oil, antifreeze, etc.). Upon request, applicant will furnish information regarding ongoing maintenance of small machinery and equipment that is necessary to support cultivation activities, including hazardous wastes that meet the reporting thresholds.

Hazardous Materials Storage

Operator will keep storage areas free from accumulated materials that cause tripping, fires, or explosions, or that may contribute to the harboring of rats and other pests. All hazardous materials storage areas shall have appropriate secondary containment structures, as necessary, to protect water quality and prevent spillage, mixing, discharge, or seepage.

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In addition, workers should consider placing bound material on racks, and secure it by stacking, blocking, or interlocking to prevent it from sliding, falling, or collapsing.

Hazardous Material Inventory

The Project is supported by PG&E utilities and does not require fuels to supply the domestic energy needs of the structures or cultivation activities. Backup gas power generation using natural gas may be proposed to support the facilities in the event of power outage. Other fuels may be used for small equipment and machinery and may include gasoline, oils, and diesel. All fuels used for equipment would be stored per the (CUPA) fuel and chemical storage guidelines.

To meet environmental health standards, applicants must maintain a list of and describe all compressed gases, cleaners, and sanitizers (including, but not limited to, household chemicals, bleach, and alcohol) and document quantities stored onsite. Fuels, pesticides, and other agricultural/household chemicals are required to be stored in locked containment, separate from other input products. Any substance in use shall be accompanied by a posted notification that clearly identifies its nature. To prevent spills onto ground surfaces, any motors, fuel containers, etc. would be stored in drop pans and within an enclosed area.

Application or use of chemicals, pesticides, and fungicides requires personal protective equipment, which may include face masks, respirators, Tyvek suits, chemical resistant gloves, and chemical resistant footwear. It is the applicator's responsibility to ensure safety on the operation.

Applicators are required to acquire an Operator ID through the Agriculture Commissioner via the Pesticide Handling Training Program (PHTP). This will involve training applicators about labels, cautions, and recommended Personal Protective Equipment (PPE). Pesticide PPE will be stored onsite and separately from fertilizers, pesticides, and fungicides. Restricted Entry Intervals (REI) would be imposed and posted after application of chemicals to prevent exposures. (See *Integrated Pest Management Plan* for additional details.)

Additional PPE provided onsite for any harvesting labor would include access to gloves and dust masks by employees during drying and packaging. It is the responsibility of managers and supervisors to ensure that PPE policies are followed during appropriate working conditions.

Project Equipment Inventory

Kitchen

- Deck Oven
- Cooktop Range
- Commercial Mixer
- Commercial Blender
- Side by Side Refrigerate/ Freezer
- Walk-in Cooler
- Dishwasher

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Manufacturing (Non-Volatile)

- Rosin Press
- Roto-Vap/ Short Path Distillation
- Vacuum Ovens
- Pollen Collection Box
- Recovery Pumps, Chillers, and Vacuums

Manufacturing (Volatile)

- Flex Mod Modular Systems (See attached specification sheet)
 - Temporary Phase one (1) Modular (Volatile) on East End of Building Lot.
 - Building #2 Up to three (3) total Manufacturing Modules inset into three (3) individual units.

Processing/Distribution

- Shrink-Wrap Machines
- Heat Seal Machines
- Vape Pen Cartridge Dispensers
- Banding Machine
- Vacuum Sealers

Cultivation

Forty-two (42) 100-watt Gavita systems for Flowering Space.

Twelve (12) 600-watt Gavita systems for Mothering Space.

Up to 300 T-12/T-5 Lighting systems for Propagation Space.

Nine (9) EverClear CM11 Odor Filtration Systems.

Nine (9) Filtered Air Intake Systems.

Maintenance

Onsite.

Project Product Inventory

Household Chemicals (Broom Closet)

- 10 Gallons-Bleach
- 1 Gallon-Simple Green
- 25 Gallons Pharmaceutical Grade Alcohol (Tinctures)

Gases (Secured Storage)

- CO2 (Max 2 Week Supply)
- Butane (Max 2 Week Supply)
- Isopropyl Alcohol (Max 2 Week Supply)

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Fertilizers/Pesticides/Fungicides/Rodenticides (Building #1- Cultivation Facility)

Fertilizer line not available currently. Applicant will be customizing a compost tea fertilizer formula derived from only certified organic input ingredients. All organic wastes will be temporarily composted onsite and removed to approved facility and water discharges will be recycled through onsite closed loop filtration system.

Soil Inventory

Formula is as follows for flowering space.

15 Gallon Pots= 2.0 cubic feet.

48 Pots/Room= 96 cubic feet soil/room.

96 cubic feet x 7 rooms= 672 cubic feet/soil.

Formula is as follows for mothering space:

Forty-Eight (48) 25-gallons pots=3.34 cubic feet/soil= 160.32 cubic feet of soil

Hazardous Materials Waste Removal

Any hazardous waste removed will comply with the Occupational Safety and Health (OSH) standards and Department of Transportation (DOT) standards in accordance with required health and safety and environmental mitigation efforts. Measures will include following all health and safety protocols, storage guidelines, placement of warning labels, documentation of quantity of product to be disposed, and proper transportation security methods as required by local and state regulations.

Hazardous materials to be handled by employees will be handled by a trained and certified member under the Hazardous Waste Operations and Emergency Response (HAZWOPER) program.

Hazardous Waste Cleanup

Operator will employ spill control and containment practices to prevent the discharge of hazardous waste. Operators will keep and use absorbent materials designated for spill containment and spill cleanup equipment on-site for use in an accidental spill of fertilizers, petroleum products, or other hazardous materials.

In the event of emergency spills, the incident would be reported to the Cal OES State Warning Center at 800-852-7550 or 916-845-8911. The California Highway Patrol would be notified via 9-1-1 of spills occurring on highways in the State. The company's *Illness and Injury Prevention Plan's* Chemical Spill Procedures would be followed, and emergency services also contacted via 9-1-1. The procedure will follow the California Office of Emergency Services (Cal OES) California Hazardous Materials Spill/Release Notification Guidance (February 2014) and the EPA's (Pacific Southwest, Region 9) Chemical Spills Prevention and Preparedness webpage.

Ongoing Compliance

The site has obtained or is in the process of applying for all required permits, licenses, or other clearances, and will comply with all orders, laws, regulations, or other requirements of other regulatory agencies, including, but not limited to local Humboldt County Department of Environmental Health, North Coast

Regional Water Quality Control Board/State Water Board, Humboldt County Planning Department, City of Rio Dell, California Department of Fish and Wildlife, and local fire authorities.

Hazardous Material Standards

Quantities that trigger disclosure are based on the maximum amount onsite at any one time, as follows:

- 55 gallons, 500 pounds, or 200 cubic feet (for 30 days or more at any time during a year).
- Any amount of hazardous waste.
- Category I or II pesticides.
- Explosives.
- Extremely hazardous substances (above the planning threshold).

MSDS for all fertilizers, soil amendments, and pesticides (including organically produced examples) would be furnished and made available onsite. Compressed gases, cleaners, and sanitizers are stored on the premises in the quantities outlined in the *Gases and Cleaners* inventory list that is maintained onsite.

Applicants are required under CUPA guidelines to list/describe all equipment maintenance performed onsite (including changing oil, antifreeze, etc.). Upon request, applicant will furnish information regarding ongoing maintenance of small machinery and equipment that is necessary to support cultivation activities.

Agricultural Product Storage

As per the DPR (enforced by CDFA or the local Agriculture Commissioner), Projects that utilize pesticides and fertilizers must meet guidelines pursuant to CCR, § 6670, Title 3, Division 6, *Pesticide, and Pesticide Control Operations*. General guidelines dictate that chemicals are to be stored separately from fuels, oils, and similar products. Fertilizers and pesticides would be stored in locked containment within an enclosed outdoor structure.

Onsite Wastewater/Hazardous Wastes

The proposed Project location will be supported by City of Rio Dell, Water services. Temporarily the facility will supply its temporary water needs from a groundwater well to be developed.

The proposed Project location is proposing a septic system that will support all three facilities. Employees would utilize the primary septic system for regular uses. Now, no record of permit exists regarding the system. A Septic suitability study has been prepared to support data on the development of this system. Further inspections may be required to identify the septic system's ability to support increased use during peak seasonal work times and whether it supports peak activity.

Effluent

The proposed CF will not discharge liquid effluent, although may produce raw cannabis waste during the juicing and medible manufacturing, and minimal effluent from facility sanitation products. Waste products will be stored in a secured cannabis destruction area under surveillance and removed from the site to an approved waste disposal facility.

Chemical Spill Procedure/Handling

In the event of emergency spills, the incident would be reported to the Cal OES State Warning Center at 800-852-7550 or 916-845-8911. The California Highway Patrol must be notified via 9-1-1 of spills occurring on highways in the State. The *Chemical Spill Procedure* would be followed, and emergency services also contacted via 9-1-1. The procedure would follow the California Office of Emergency Services (Cal OES) *California Hazardous Materials Spill/Release Notification Guidance* (February 2014) and the (EPA) (Pacific Southwest, Region 9) *Chemical Spills Prevention and Preparedness* webpage.

In the State of California, many statutes require emergency notification of a hazardous chemical release, including:

- California Labor Code § 6409.1 (b).
- Government Code § 51018, 8670.25.5 (a).
- Health and Safety Code § 25270.8, § 25510.
- Public Utilities Code § 7673 (General Orders #22-B, 161).
- Title 42, U.S. Code § 9603, 11004.
- Vehicle Code § 23112.5.
- Water Code § 13271, § 13272.

In addition to statutes, several agencies have notification or reporting regulations:

- Title 8, CCR, § 342.
- Title 13, CCR, § 1166.
- Title 14, CCR, § 1722 (h).
- Title 17, CCR, § 30295.
- Title 19, CCR, § 2703, 2705.
- Title 22, CCR, § 66265.56 (j), § 66265.196 (e).
- Title 23, CCR, § 2230, 2250, 2251, 2260.
- Title 40, CFR, § 263 esp. § 263.30.
- Title 49, CFR, § 171.16.

Solid Waste Removal/Recycling

All garbage will be contained within a holding structure and is to be removed no less than once per week. A permitted solid waste/recycling facility will process all waste and/or recycling materials. The facility designated to receive waste products for this project is Eel River Recovery in Fortuna, CA.

Water Production/Well Construction

The Project is supported by a temporarily by a groundwater well. The long-term water support system would be provided by a water main supplied by the City of Rio Dell and would support all domestic and cultivation uses.

Approximated water use for activities are denoted within the *Cultivation Schedule* under the Cultivation Plan. Monthly monitoring and annual reporting must be implemented to identify actual total uses for domestic and cultivation activities.

Pest Management Plan

As described in the Cannabis Cultivation Policy of the California State Water Resources Control Board, an Integrated Pest Management Plan is an ecosystem-based strategy that focuses on long term prevention of pests and their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.

This plan will discuss the following distinct categories for a through IPM Program:

1. Genetic Host Resistance
2. Cultural Practices
3. Biological Control
4. Environmental Control
5. Chemical Applications
6. Government Regulatory Measures

Genetic Host Resistance

Cannabis research for developing genetic resistance to common pests has yet to be established. As the industry develops there will be ongoing monitoring for news and information related to genetic breakthroughs for strains with greater resistance of common diseases and pests, which are compatible with the local climate.

Cultural Practices

Operator will reduce and or disrupt pest habitat when appropriate through a variety of potential measures including:

- Destroying or removing crop residue from the field by plowing, shredding, chopping, or burning, to remove or kill pests that are inhabiting the residue.
- Surveying field-edge vegetation and removing invasive plants that are known to harbor or provide food for pests when found.
- Managing irrigation practices to prevent runoff or excess nutrient flows which may be supporting pest habitation.
- Implementing tillage timed to disrupt underground pest's life cycle and directly control insect pest populations.

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- Removing available hiding places for habitation by cleaning up any clutter such as cardboard boxes, crates, used tires, wood piles, or other debris.

If necessary, crop planting will be delayed in an area where pests were recently present to reduce potential for future insect damage through avoidance.

If pest infestation reaches a high economic injury level to the crop, it may require the need to undertake an early harvest.

Operator will also consider Trap cropping, where “host” plants are provided for an insect pest near the primary crop that is to be protected. The pest then infests the preferred or “trap” crop instead of the primary crop. If necessary, the pests would then be killed in the trap crop.

Biological Control

Biological control is the use of natural enemies to pests such as predators, parasites, pathogens, and competitors. Operator will consider a variety of potential biological sources through the season including:

- Biological prey - predatory mites, ladybugs, beneficial nematodes, etc.
- Natural fungicides - potassium bicarbonate, sodium bicarbonate, etc.
- Microbial bacteria's - *Bacillus thuringiensis*, *Beauveria bassiana*, and *Bacillus subtilis* QST, etc.
- Botanicals - planting Zinnias, Marigolds, Chrysanthemums, Lavender, etc.
- Horticultural oils - neem oil, garlic oil, citrus oils, other essential oils
- Minerals - diatomaceous earth

Applications of biological controls can include either topical organic methods, release of predatory insects, planting of trap crops, and prevention through sanitation efforts.

Applications will vary based on the pest being addressed and extent of the infestation. Treatments are made with the goal of removing only the target organism. Materials will be selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.

Environmental Control

As with high value crops such as nurseries, cut flowers, tomatoes, leafy vegetables, and homestead farm crops, environmentally controlled greenhouse structures will contain the Cannabis crop to assist in preventing the presence of pests, along with all other cultural and biological controls being implemented.

Without the presence of other IPM controls, this type of environment can also foster and promote habitat for pest colonies and will be monitored closely. These types of controlled environments are beneficial to the grower as they can manipulate climate control conditions to create an environment that deters specific pests while providing additional shelter for high value crops from transporting pests.

Other effective controls will involve monitoring climate patterns, colony life cycles, water quality, soil moisture, and inputs as well as implementing cultural measures, such as crop rotations.

Quality control of the environments fostering crops will adhere to a stringent regime of cleaning nursery materials, debris management, pest remediation, and culling cultivars susceptible or exposed to pest colony damage.

Chemical Applications

Chemical applications will be determined by an action threshold established for evaluating the potential for economic injury versus the need for more dramatic pest reduction methods. If cultural and biological controls are deemed ineffective and, based on pest colonization and plant injury the action threshold is met, the result will be use of chemical applications to further suppress and reduce impact to economic yield and eradicate the pest activity.

Per California Food and Agricultural Code section 12753(b), the term “Pesticide” includes any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, as defined in Section 12754.5, which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or non-agricultural environment whatsoever.

If use is required, pesticide products applicators will not use a rate that is higher than the rates listed on the label and follow the agricultural use requirements including method of application, restricted entry interval, personal protective equipment, and pre-harvest intervals.

Chemical applications are provided through two channels of application; topical (spray/atomized) or systemic. Active compounds can include either inorganic or organic materials.

Natural farming methods will rely on food-grade granules, powders, essential oils, or insecticidal soaps whose active ingredients are exempt from registration requirements.

Application of pesticides and fungicides requires personal protective equipment, including respirators, Tyvek suits, and gloves. It is the applicator’s responsibility to ensure safety in the field. The site manager will be responsible for furnishing, applying, and informing of the appropriate uses associated with such products.

Applicators will, as required, acquire an Operator ID through the Agriculture Commissioner via the Pesticide Handling Training Program (PHTP). This will involve training applicators about labels, cautions, and recommended Personal Protective Equipment (PPE).

In compliance with DPR best practices the operator will also:

- Provide additional PPE items onsite for all applicators. Available items will include access to chemical resistant gloves, eye protection, respirators, bodysuits and related health and safety protection for pre and post application.
- Prior to any pesticide use, the Operator will ensure the applicator be designated an Operator ID, and will employ the proper PPE during application, as well as follow label warnings and Safety Data Sheet (SDS) instructions in the event of exposure, poisoning, or spills.
- As required by the California Department of Pesticide Regulation (DPR), the Pesticide Safety Information Series (PSIS A-8) *“Safety Rules for Pesticide Handlers on Farms”* and (PSIS A-9) *“Pesticide Safety Rules for Farm Workers”* will be completed and visible to all employees. (See Exhibit A)
- DPR A-8 and A-9 signage will be posted in the chemical headquarters (not generally in office) to accompany the onsite Pesticide Use Log (PUL) and SDS documents.
- Eyewash bottles will be provided in application and mix loading areas, and handwashing facilities will be readily available.
- 24-48 Hours prior to the application of registered pesticide products Restricted Entry Interval (REI) postings shall be placed at the entrance to any areas to be affected.
- For all products used and stored, care will be given to ensure that product labels are always kept with products.

Operator will keep storage areas free from accumulated materials that cause tripping, fires, or explosions, or that may contribute to the harboring of rats and other pests. All hazardous materials storage areas shall have appropriate secondary containment structures, as necessary, to protect water quality and prevent spillage, mixing, discharge, or seepage.

In addition, workers should consider placing bound material on racks, and secure it by stacking, blocking, or interlocking to prevent it from sliding, falling, or collapsing.

Any hazardous waste removed will comply with the Office of Occupational Safety and Health (OSH) and Department of Transportation (DOT) standards in accordance with required health and safety and environmental mitigation efforts. Measures will include following all health and safety protocols, storage guidelines, placement of warning labels, documentation of quantity of product to be disposed, and proper transportation security methods.

Hazardous materials to be handled by employees will be handled by a trained and certified member under the Hazardous Waste Operations and Emergency Response (HAZWOPER) program.

Government Regulatory Measures

Pesticides must be registered by both the U.S. Environmental Protection Agency (U.S. EPA) and the California Department of Pesticide Regulation (DPR) before they can be sold and used in California. There

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are no pesticides registered specifically for use directly on Cannabis and the use of pesticides on Cannabis plants has not been reviewed for safety or human health effects.

Under California law, the only pesticide products not illegal to use on Cannabis are those that contain an active ingredient that is exempt from residue-tolerance requirements; and registered and labeled for a use that is broad enough to include use on Cannabis (e.g. unspecified green plants); or Exempt from registration requirements as a minimum risk pesticide under FIFRA section 25(b) and 3 CCR § 6147. (FAC §§ 12973, 12995; 3 CCR § 6490.)

Prior to using any eligible pesticides, the operator will obtain a proper identification number from the County Agricultural Commissioner and conduct usage with proper Department of Pesticide Regulation training, certification, and supervision.

All staff working in a canopy cultivation area where pesticides will be used, will annually be required to obtain a valid personal pesticide license or certificate issued by the department or other valid certificate of pesticide training. Standard training will include:

- Where and in what forms pesticides may be encountered, including treated surfaces in the field, residues on clothing, personal protective equipment, application and chemigation equipment, irrigation water, and drift;
- Potential hazards that pesticides present to fieldworkers and their families including acute, chronic, and delayed effects, and sensitization effects;
- Routes by which pesticides can enter the body;
- Signs and symptoms of overexposure;
- Routine decontamination procedures when working in a treated field and the employer's responsibility to provide decontamination supplies:

Environmental Protection and Toxic Substances publication EPA 735F99024 features language that specifically regulates against Pesticide Drift impacts to neighboring properties and crops. The operator will ensure standard protocols are followed to avoid drift. As the EPA and local agencies support complaint-based enforcement, the operators will be prepared to review protocols and internal processes and respond immediately upon notification of any complaints.

U.S. EPA designates certain pesticide products as federally “Restricted Use” products when they determine those products may cause unreasonable adverse effects even when used as directed on the product labeling. Restricted Use pesticides are limited to use by certified applicators, or to those under the supervision of a certified applicator.

In addition, the DPR also designates certain pesticide active ingredients as California “Restricted Materials” or placed on the “Groundwater Protection List” when they determine those pesticides are especially hazardous to human health or the environment. Application of Restricted Use or Restricted

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Materials products require a permit issued by the County Agricultural Commissioner. As permits will not be issued for Cannabis cultivation sites, no EPA Restricted Use, DPR Restricted Material, or Groundwater Protection List pesticides will be used at this time. (FAC § 14001, et seq.; 3 CCR § 6400 and § 6800.)

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Appendices

The following regulatory information sources contributed to the development of this narrative.

Source Guide for Federal & State Requirements for Employee & Migrant Housing

Housing Standards/Requirements for Employee/Migrant Housing Caretakers

Health & Safety

- First Aid.
- Communicable Diseases.
- Hand Washing, Bathing, and Laundry.
- Cooking, Kitchen, and Mess Halls.
- Garbage and Refuse.
- Insects and Rodents.

Occupancy & Structural Guidelines

- Housing Site.
- Housing Structure.
- Postings of Required Information.
- Permit to Operate Housing.
- Mobile Homes, Recreational Vehicles, and Commercial Modular.
- Tents.
- Construction and Repair.
- Fire Safety.
- Electrical.
- Lighting.
- Heating.
- Liquid Propane (LP) Gas.

Waste Management

- Toilets.
- Water Supply.
- Screens.
- Sewage.

Enforcement

- Enforcement and Penalties.
- Remediation and Mitigation.

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Sources of Additional California Regulatory Information

SOURCES OF ADDITIONAL INFORMATION			Sacramento	San Benito	San Joaquin			
More specific information can be obtained by:			Environmental Health 8475 Jackson Road, 240 Sacramento, CA. 95826 (916) 875-8484	Building and Safety 3224 Southside Road Hollister, CA 95023 (831) 637-5313	Public Health Services 304 E. Weber Ave. Stockton, CA 95202 (209) 468-3426			
1. Review of the following reference documents at law and public libraries:			San Mateo Health Services Agency 455 County Center, 4 th Fl. Redwood City, CA 94063 (650) 363-4305		Santa Cruz Health Services Agency 701 Ocean Street, Rm 312 Santa Cruz, CA 95060 (831) 454-2022			
<ul style="list-style-type: none"> California Health and Safety Code, Division 13, Part 1, beginning with Section 17000. California Code of Regulations, Title 25, Chapter 1, beginning with Section 600. California Code of Regulations, Title 24, California State Building Code. Federal Migrant and Seasonal Agricultural Worker Protection Act Code of Federal Regulations, Title 29, Parts 500 through 500.270. Code of Federal Regulations, Title 29, Part 1910.142 (OSHA Reg.) 			Stanislaus Environmental Res. 3800 Cornucopia Way, Ste. C Modesto, CA 95358-9492 (209) 525-6700		Tulare Resource Management Agency 5961 S. Mooney Blvd Visalia, CA 93277-939 1-800-228-6133			
2. Obtaining or purchasing copies of documents as follows:			STATE OF CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT DIVISION OF CODES AND STANDARDS					
<ul style="list-style-type: none"> <u>CALIFORNIA HEALTH AND SAFETY CODE, DIVISION 13, PART 1</u> (Employee Housing Act) can be purchased from: West Publishing Company, PO Box 64526, St. Paul, MN; telephone 800-328-4880. <u>CALIFORNIA CODE OF REGULATIONS, TITLE 25, CHAPTER 1,</u> <u>and the CALIFORNIA CODE OF REGULATIONS, TITLE 24.</u> Can be purchased from: Barclays Law Publishers, Attention: CCR/Agency Services Representative 400 Oyster Point Blvd., PO Box 3006, South San Francisco, CA. 94083 800-888-3600 or on the internet at http://www.leginfo.ca.gov/calaw.html <u>MIGRANT AND SEASONAL AGRICULTURAL WORKERS PROTECTION ACT</u> <u>and OSHA REGULATION 1910.142.</u> Can be obtained by contacting the Wage and Hour Division of the U.S. Department of Labor offices as shown on this page or on the internet at, http://www.dol.gov/esa/vhd/mspa/index.htm 			NORTHERN CALIFORNIA: (North of Fresno County) 9342 Tech Center Dr #550 Sacramento, Ca. 95826 (916) 255-2501			SOUTHERN CALIFORNIA (South of Madera County) 3737 Main Street, Ste 400 Riverside, CA 92501 (951) 782-4420		
3. Contacting the appropriate government offices listed below:			U.S. DEPARTMENT OF LABOR WAGE & HOUR DIVISION					
If the housing is located in one of the following counties contact the county office listed below:								
Fresno Environmental Health Systems 1221 Fulton Mall, 3 RD Floor Fresno, CA 93775-1867 (559) 445-3391	Kern Environmental Health 2700 M. Street, Suite 300 Bakersfield, CA 93301 (661) 862-8700	Merced Environmental Health 777 W. 22 ND St. Merced, CA 95340 (209) 381-1100	LOS ANGELES 300 South Glendale Ave., 400 Glendale, CA. 91205-1752 (818) 240-5274/75	SAN FRANCISCO 455 Market St., 800 San Francisco, CA. 94105 (415) 744-5590	SACRAMENTO 2800 Cottage Way, Rm. W-1836 Sacramento, CA. 95825-1886 (916) 978-6123			
Monterey Environmental Health 1270 Natividad Road Salinas, CA 93906 (831) 755-4500	Napa Environmental Health 1195 Third Street, 101 Napa, CA 94559 (707) 253-4471	Orange Environmental Health Div. 2009 E. Edinger Avenue Santa Ana, CA. 92705 (714) 667-3600	WEST COVINA 100 North Barranca St., 850 West Covina, CA. 91791 (626) 966-0478					
			SAN DIEGO 5675 Ruffin Rd, 320 San Diego, CA. 92123-1362 (619) 557-5606					

Federal Governing Bodies & Regulatory Framework

- U.S. Department of Agriculture.
- U.S. Environmental Protection Agency.
- Farm Labor Standards Act.
- Farm Bill 2014.
- Clean Water Act (CWA)/Safe Drinking Water Act (SDWA).
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- Resource Conservation & Recovery Act (RCRA).
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA/Superfund).
- Clean Air Act (CAA).
- Emergency Planning & Community Right to Know Act (EPCRA).

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Summary of Employment Requirements for California Agricultural Employers

Table of Contents

- Introduction.
- New and Updated Materials.

Cal/OSHA

- Cal/OSHA Safety and Health Requirements.
- Cal/OSHA Consultation Services.
- Injury and Illness Reporting.
- Injury and Illness Prevention Program.
- Field Sanitation.

Definitions

- Alternative Compliance.
- Drinking Water Requirements.
- Toilet and Handwashing Facilities.
- Location.
- Maintenance Standards.
- Handwashing Facilities.
- Notice to Employees.
- Required Reports.
- Recordkeeping.
- Weeding, Thinning, and Hot-Capping.

Heat-Illness Prevention

- Personal Protective Equipment (PPE).
- Tree Work Maintenance or Removal.
- Personal Protective Equipment Checklist.
- First Aid and CPR.
- Cleaning, Repairing, Servicing, and Adjusting Machinery and Equipment.
- Operation of Agricultural Equipment.
- Transporting of Employees.
- Manual Lifting and Carrying.
- Tools.
- Working at Heights.
- Mounted Air Compressors and Air Tanks.

Emergency Action Plan

- Fire Prevention Plan.
- Access to Medical and Exposure Information.

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Hazard Communication Program

- Respiratory Protection.
- Storage of Hazardous Substances.
- Top 10 Cal/OSHA Violations in Agricultural Operations.
- Other Safety Issues.
- Safety Training.
- Specific Training Requirements.
- Hearing Conservation.
- Ergonomics standard.
- Tractor Roll Over Protection.

Injury and Illness Prevention Program

- Formula for Improved Injury Prevention.
- Steps to Successful Compliance.
- Responsibilities of the Safety Coordinator.
- Include a system for ensuring that employees comply.
- Summary of Employment Requirements for California Agricultural Employers Training.
- Discipline.
- Recognition.
- Safety Compliance Program.
- Communicating with Employees.
- Identifying and Evaluating Workplace Hazards.
- Safety Incident Investigation.
- Training and Instruction.
- Safety Program Records.
- Other Safety Records.

Pesticides

- Pesticide Safety Regulations.
- Employer/Employee Responsibilities.
- Hazard Communication.
- Training.
- Labels and Other Warnings.
- Emergency Medical Care.
- Restricted Entry Interval.
- Early Entry Requirements.
- Respiratory Protection.

Pesticide Postings

- I-8 and I-9

Wage-and-Hour Requirements

- Minimum Wage.
- State Exceptions.
- Credits Against Minimum Wage for Meals and Lodging.
- Piece Rates.
- Travel Time.
- Waiting Time.
- Preparation Time.
- Overtime.

Federal & State Wage Provisions

- IWC Order No. 4.
- IWC Order No. 8.
- IWC Order No. 13.
- IWC Order No. 14.
- Overtime Rules under Order No. 14.
- Overtime Rules under Order Nos. 4, 8, and 13.
- Which IWC Order Applies?
- Working Under Two IWC Orders.
- Federal Complication.
- Winery Employment.
- Cold-Storage Activities.
- Figuring Overtime Pay.
- Workweek Defined.
- Workday Defined.
- Overtime Exemptions – State.
- Executive, Administrative, or Professional Employees.
- Executive Exemption.
- Administrative Exemption.
- Professional Exemption.
- Outside Salespersons.
- Commissioned Inside Salespersons.
- Truck Drivers.
- Parents, Spouse, or Children.
- Irrigators.
- Part-Time Employees.
- Make-Up Time.
- Summary of Employment Requirements for California Agricultural Employers.
- Truck Drivers.

Federal Provisions & California Provisions

- Weekend or Holiday Overtime.

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- Other Wage-Hour Issues.
- Split-Shift Premium Pay.
- Piece Rates and Commissions.
- Bonuses' Effect on Overtime Pay.
- Group Rate for Piecework.
- Non-Piece-Producing Work Time of Piece-Rate Employees.
- Exempt Salaried Employees - Salary Deductions.
- Summary of Allowed Salary Deductions.
- Summary of Illegal Salary Deductions.
- Non-Exempt Salaried Employees.
- Clerical and Office Staff.
- Mechanics.
- Housing Employees.
- Workers' Compensation Premiums.
- Taxes.
- Workday and Workweek.
- Paid Time Off and Hours Worked.
- Paydays.
- Workers Employed by Farm Labor Contractors.
- Employees Boarded and Lodged.
- All Other Agricultural Employees.
- Executive, Administrative, and Professional employees.
- Payroll Deductions and Offsets Against Wages.
- Lawful Deductions.
- Garnishment of Wages.
- Employer May Not Collect or Receive Wages Paid Employee.
- Self-Help by Employers to Recover Unliquidated Sums.
- Losses Resulting from Simple Negligence.
- Discipline as an Alternative.
- Loss Suffered from an Employee's Dishonest or Willful Act or Gross Negligence.
- Deductions for Loans Made to Employees.
- Any Deduction Must be for Direct Benefit of Employee.
- Specific Deductions.
- Deductions Allowed by IWC Orders – Caveat.
- Deduction for Tardiness.
- Final Pay.
- Discharged or Laid Off.
- Quitting Employee.
- Waiting-Time Penalty.
- Working Conditions.
- Rest Periods.
- Meal Periods.

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- Day's Rest.
- Accommodation.
- Reporting-to-Work Pay.
- Tools.
- Uniforms.
- Personal Protective Equipment – Indemnification.
- Vacations.
- Holidays.
- Sick Pay.
- Severance Pay.
- Pension Plans.
- Health Insurance.
- Summary of Employment Requirements vi for California Agricultural Employers Different Health Insurance for Different Employees.
- Discontinuance of Health Insurance During Workers' Compensation Disability.
- Leaves of Absence - Time Off from Work.
- Pregnancy-Disability Leave.
- Family and Medical Leave Act and California Family Rights Act.
- Court Duty.
- Time Off for Crime Victims.
- Emergency Duty as a Volunteer Firefighter.
- Time Off to Participate in a Child's Daycare Facility or School Activities.
- Time Off to Appear at School at School's Request.
- Time Off to Vote.
- Drug and/or Alcohol Rehabilitation.
- Literacy Assistance.
- Temporary Military and/or Reserve Duty Leave.
- Military-Spouse Leave.
- Mass Layoff/Plant Closure (WARN Act).
- Federal WARN Act.

Definitions

- California WARN Act.
- Farm Labor Contractors.
- Responsibilities of a Grower Using a Farm Labor Contractor (FLC).
- Independent Contractor Reporting.
- Land-Management Services.
- Migrant and Seasonal Agricultural Worker Protection Act (MSPA).
- Coverage Under the MSPA.
- Employer Coverage.
- Farm Labor Contractor Coverage.
- Employee Coverage - Migrant or Seasonal Agricultural Workers.

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Additional Definition of Terms

- Migrant Agricultural Worker Exemption.
- Seasonal or Another Temporary Basis Defined.
- Field Work Defined.
- Overview of MSPA Requirements.
- Joint Employer Relationship.
- MSPA Requirements for All Entities.
- MSPA Requirements for Farm Labor Contractors.
- Contracts for Labor or Services.
- Penalties.
- Private Right of Action.
- Specific Requirements for Farm Labor Contractors.
- Checklist of Farm Labor Contractor (FLC) Requirements.
- Employer Tax Registration Requirements.
- California Employer Identification Number.
- California Franchise Tax Board.
- Internal Revenue Service (IRS).
- Insurance and Bonding Requirements.
- Workers' Compensation Insurance Coverage.
- Vehicle Liability Insurance.
- Farm Labor Contractor Bonding.
- Farm Labor Contractor Registration and License Requirements.

General

- Federal Registration.
- State Farm Labor Contractor License Requirements.
- State License.
- Responsibilities of a Grower or FLC Using an FLC.
- Application.
- Summary of Employment Requirements for California Agricultural Employers.
- Farm Labor Contractor Examination.
- Continuing Education.
- Laws Relating to Farm Labor Contractor Employment of Employees.
- FLC Supervisors.
- Worker Recruitment.
- Statement of Unpaid Wage Judgments.
- Grounds for Losing a Farm Labor Contractor License.
- Penalties.
- Penalties for Failures to Pay Wages.
- County Agricultural Commissioner Registration.
- Workers' Compensation.
- Premiums.

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- Coverage.
- Employee Exclusions.
- Responsibilities of Employers.
- Reportable Injury.
- Notice of Injury by Employee.
- Employee Claim Form.
- Physician or Chiropractor Designation.
- Disability Benefit Payments.
- Medical Treatment.
- Premium Calculations.
- Traveling to or From Work.
- Exclusive Remedy; Exceptions.
- Serious and Willful Misconduct.
- Illegally Employed Minors.
- Discrimination - Labor Code Section 132a.
- Penalties.
- Postings.
- Employment Insurance.
- Unemployment Insurance.
- Covered Employers.
- Experience Rating.
- Employer Account Number.
- Required Records.
- Time Limits of Records.
- Posting and Notice Requirements.
- Written Notice to Employee.
- Penalties.
- Disability Insurance and Paid Family Leave.
- Benefits of California SDI Coverage.
- Paid Family Leave Program.
- Child Labor.
- Work Permits.
- Agricultural Zone of Danger.
- Child Labor Summary.
- Exemption for One's Own Children.
- Minimum Age Standards General.
- Permits to Work and to Employ.
- Recordkeeping.
- Hours of Work.
- Spread of Hours.
- Restricted and Hazardous Occupations.
- Posting of Notice.

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- Wages.
- Citations and Penalties.
- Posting Requirement.
- Transportation.

Summary of Employment Requirements for California Agricultural Employers Transportation of Interstate Commerce Act (ICA) Regulations

- Migrant and Seasonal Agricultural Worker Protection Act (MSPA).
- FLC Transportation of Worker.
- Vehicles Covered Under Regulations Developed by DOL.
- Exempt Vehicles.
- Rules Which Apply to All Vehicles.
- Vehicle Insurance Requirements.
- Vehicle Safety Regulations Developed by the DOL.
- State Statutes and Regulations.
- Farm Labor Vehicles.
- Vehicle Inspections.
- Vehicle Drivers.
- Farm Labor Vehicles.
- Farm Labor Vehicle Equipment.
- Pickup, Flatbed, and Dump Trucks.
- Trucks.
- Carrier or Employer Responsibility.
- Cal/OSHA.
- Liabilities Relative to Transportation.
- Tractor-Driver Licensing Requirements.
- Transporting Employees.
- Operation on Public Highways.
- Transportation Provided by Supervisors.

Housing

- State Coverage.
- Cal/OSHA Requirement.
- Fees for Permits and Inspections.
- Prohibitions.
- Federal Coverage.
- Penalties.
- Credits Against Minimum Wage for Meals and Lodging.
- Impact of Housing Employees.
- Evictions; Housing Agreements.
- Agricultural Labor Relations Act (ALRA).

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- Agricultural Labor Relations Board (ALRB).
- Coverage under the ALRA.

Definitions

- Agricultural Employer.
- Farm Labor Contractor.
- Supervisor.
- Agricultural Employees.
- Union.
- Concerted Activities.
- Unfair Labor Practice.
- Union Elections and Collective Bargaining.
- Mandatory Mediation Order.
- Union Access.
- Unfair Labor Practices.
- Strikes, Picketing and Economic Boycotts.
- Remedies for Unfair Labor Practices.
- ALRB Remedies.
- Discrimination.
- Discrimination - General Background.
- Federal.
- California.
- Other Laws.
- Protected Categories and Definitions.
- Summary of Employment Requirements for California Agricultural Employers.
- Ancestry, Race, Color, and National Origin.
- Sex Discrimination.
- Supervisor Harassment Training.
- Sexual Orientation.
- Gender Identity Discrimination and Harassment.
- Pregnancy, Childbirth, and Related Medical Conditions.
- Marital Status.
- Age Discrimination.
- Disabilities.
- Reasonable Accommodation.
- Pre-Job-Offer Inquiries.
- Post-Job-Offer, Pre-Employment Medical Examinations.
- Employee Examinations.
- Alcohol and Other Drugs.
- Religious Discrimination.
- Discrimination - Other Laws.
- Privacy in Employment.

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- Employee's Off-Work Activities.
- Garnishments.
- Return to Work Due to Medical Absence.
- Employers with one or more employees.
- Employers regularly employing five or more employees.
- Pregnancy Disability.
- Reporting Requirements - EEO-1.
- Applicant Identification Records.
- Harassment.
- Types of Sexual Harassment.
- Quid Pro Quo.
- Hostile or Offensive Work Environment.
- Duty to Prevent Sexual Harassment by Non-Employees.
- Notices, Posters, Disclosures and Records.
- Notices and Disclosures.

U.S Department of Labor

- Wages and Hours - Federal.
- Children's Health Insurance Program Reauthorization Act of 2009 (CHIPRA).
- Customer Protection and Affordable Care Act.
- Wage and Hour Regulation - State IWC Orders.
- Industrial Welfare Commission (IWC).
- Payday Notice.
- Statement of Wages.
- Compensation Notice.
- Farm Labor Contractor Rate of Compensation.
- Commissioned Employee - Written Contract Requirement.
- Migrant and Seasonal Agricultural Worker Protection Act (MSPA).
- General MSPA Poster.
- Worker Information.
- Housing Terms and Conditions.
- National Labor Relations Act (NLRA) Employee Rights.
- Employment of Minors.
- Employment Development Department (EDD).
- Equal Employment Opportunity is the Law.
- Equal Employment Opportunity is the Law.
- Age Discrimination is Against the Law.
- Family and Medical Leave Act (FMLA).
- California Fair Employment and Housing Commission (FEHC).
- Pregnancy-Disability Leave.
- California Family Rights Act (CFRA).
- Discrimination in Employment is Prohibited by Law.

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- Summary of Employment Requirements for California Agricultural Employers.
- Time Off to Vote.
- Housing and Meals.
- Operators of Labor Camps.
- Amounts Charged for Meals and Lodging.
- Fair Housing is the Law.
- Cal/OSHA.
- Safety and Health Protection on the Job.
- Cal/OSHA Form 300A.
- Field Sanitation Facilities.
- Access to Medical and Exposure Records.
- Agricultural - Industrial Tractors.
- Operating Rules for Industrial Trucks.
- Handwashing Water.
- California Safe Drinking Water and Toxic Enforcement Act.
- Pesticide Postings.
- Posting of Pesticide Storage Areas.
- Emergency Medical Care.
- Emergency Medical Services.
- Field Postings.
- Irrigation.
- Fumigants.
- Application-Specific Information for Field Workers.
- Pesticide Safety Information Series A-8.
- Pesticide Safety Information Series A-9.
- Workers' Compensation.
- Notice of Compensation Carrier.
- Medical Provider Network Information.
- Off-Duty Recreation.
- Written Notice to New Employees.
- Employee Polygraph Protection Act.
- Whistleblower Hotline.
- Uniformed Services Employment and Reemployment Rights Act (USERRA).
- Mass Layoff/Plant Closure (WARN).
- Human Trafficking/Slavery Notice.
- Recordkeeping and Reports.
- Cal/OSHA.
- Field Sanitation Report.
- Recordkeeping.
- GISO § 3203.
- Department of Pesticide Regulation.
- Employment Development Department.

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- Wages and Payroll.
- Statement of Wages.
- Recording Hours Worked.
- Payroll and Related Records.
- Workday and Workweek.
- Personnel Records.
- Job Applications; Personnel Records.
- Records That Must be Kept.
- Immigration.
- CIS Form I-9.
- Farm Labor Contractor (FLC).
- FLC License.
- FLC Payroll Records.
- Leave of Absence.
- Family and Medical Leave Act.
- California Family Rights Act.
- Discrimination.

Summary of Employment Requirements for California Agricultural Employers

- Applicant Identification Records.
- EEOC EEO-1 Report.
- Recordkeeping and Inspection Requirements.
- Inspection and Copying of Personnel Files.
- Inspection and Copying of Payroll Records.
- Workers' Compensation.
- Employee Claim Form.
- Form to Indicate Physician or Chiropractor.
- Child Labor.
- Permit to Employ and Work Permit.
- Date of Birth.
- Checklist of Forms and Reports.

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Glossary of Abbreviations & Definitions

- AAPCC:** American Association of Poison Control Centers
- AB:** Assembly Bill
- ABA:** Architectural Barriers Act
- ADA:** Americans with Disabilities Act
- ALRA:** Agricultural Labor Relations Act
- ALRB:** Agricultural Labor Relations Board
- APN:** Assessor's Parcel Number
- AUMA:** Adult Use Marijuana Act (Prop 64)
- BCC:** Bureau of Cannabis Control
- BMCR:** Bureau of Medical Cannabis Regulation
- BMP:** Best Management Practices
- BOE:** Board of Equalization
- CAC:** County Agricultural Commissioner
- Cal OES:** California Office of Emergency Services (*See also OES*)
- CALRA:** California Agricultural Labor Relations Act
- CALRB:** California Agricultural Labor Relations Board
- CBC:** California Building Code
- CBO:** Cannabis Board Order
- CCR:** California Code of Regulations (also Cal. Code Regs.)
- CDFA:** California Department of Food and Agriculture
- CDFFP:** California Department of Forestry and Fire Protection (CAL FIRE)
- CDF:** California Department of Fire
- CDFW:** California Department of Fish and Wildlife
- CDIR:** *Also see DIR:* California Department of Industrial Relations
- CD:** Community Development
- CDPH:** California Department of Public Health
- CDWC:** California Division of Worker's Compensation
- CEH:** Center for Environmental Health

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CEQ: Council on Environmental Quality
CEQA: California Environmental Quality Act
CFR: Code of Federal Regulations
CFSAN: Center for Food Safety and Applied Nutrition
CLRB: California Labor Relations Board
CSLB: California State Licensing Board
CMCLUO: Commercial Medical Cannabis Land Use Ordinance
CP: Community Planning
CPD: County Planning Department
CPRC: California Public Resources Code
CSWC: California State Warning Center
CUPA: California Unified Program Act
DCA: Department of Consumer Affairs
DD: Development Department
DEH: Division of Environmental Health
DFEH: Department of Fair Employment and Housing
DHHS: Department of Health and Human Services
DIR: Department of Industrial Relations
DLSE: Department of Labor Standards Enforcement
DL-WHD: Department of Labor, Wage and Hour Division
DOL: Department of Labor
DPH: Department of Public Health
DPR: Department of Pesticide Regulation
DWC: Division of Workers' Compensation
DWR: Division of Water Rights
EEOC: Equal Employment Opportunity Commission
EIR: Environmental Impact Report
EPA: Environmental Protection Agency
FLC: Farm Labor Contractor
FLSA: Fair Labor Standards Act
GAP: Good Agricultural Practices

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GHP: Good Handling Practices
GP: General Plan
HIPP: Heat Injury Prevention Plan
HSC: Health and Safety Code
HUC: Hydrologic Unit Code
IIPP: Injury and Illness Prevention Program
IPM: Integrated Pest Management
ISWDU: Initial Statement of Diversion and Use
LLC: Limited Liability Company
LRDP: Long Range Development Plan
LSA: Lake and Streambed Alteration
LSAA-1600/1602: Lake and Streambed Alteration Agreement
LC: Labor Commissioner
MBC: Medical Board of California
MCRSA: Medical Cannabis Regulation and Safety Act
MND: Mitigated Negative Declaration
MOU: Memorandum of Understanding
MRP: Monitoring and Reporting Program
MSDS: Material Safety Data Sheet
MSPA: Migrant Seasonal Protection Act
NCRWQCB: North Coast Regional Water Quality Control Board
ND: Negative Declaration
NEPA: National Environmental Policy Act
NLRB: National Labor Relations Board
NMBC: Non-Profit Mutual Benefit Corporation
NOE: Notice of Enrollment
NOI: Notice of Intent
NOP: National Organic Program
NRCS: Natural Resources Conservation Service
NWIC: Northwest Information Center
OES: Office of Emergency Services

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OMCS: Office of Manufactured Cannabis Safety
OMRI: Organic Materials Review Institute
OPR: Office of Planning and Research
OSHA: Occupational Safety and Health Administration
OSHG: Occupational Health and Safety Guidelines
OSHT: Occupational Safety and Health Technician
PG&E: Pacific Gas and Electric
PHTP: Pesticide Handling Training Program
PPE: Personal Protective Equipment
REI: Restricted Entry Interval
SB: Senate Bill
SDS: Safety Data Sheets (*See also MSDS*)
SDU: Small Domestic Use
SIU: Small Irrigation Use
SOP: Standard Operating Procedures
SWRCB: State Water Resources Control Board
THPO: Tribal Historical Preservation Office
USC: United States Code
USCB: United State Census Bureau
USDA: United States Department of Agriculture
US-DOL: United States Department of Labor
USDHHS: United States Department of Health and Human Services
WBO: Water Board Order
WDID: Waste Discharge Identification
WHD: Wage and Hour Division
WRPP: Water Resource Protection Plan
WWD: Waste Waiver Discharge Program

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Other Relevant Sources

- Adult Use of Marijuana Act (AUMA), <http://bit.ly/2hTHGHw>.
- Agricultural Operations, Field Sanitation, California Code of Regulations, Title 8, § 3457, <http://bit.ly/2jDeHrW>.
- Best Management Practices (SWRCB), <http://bit.ly/2ji6JEK>.
- Bureau of Medical Cannabis Regulation, or Bureau of Marijuana Control, <http://bit.ly/2pb9Lkq>
- CalCannabis, <http://bit.ly/2qHI43T>
- California Building Code (CBC), <http://bit.ly/2ji3wFb>.
- California Code of Regulations, § 51018, <http://bit.ly/2jq7azr>.
- California Environmental Quality Act (CEQA), <http://bit.ly/2jigkLE>.
- California Field Sanitation Standards, <http://bit.ly/2jDeHrW>.
- California Hazardous Materials Spill/Release Notification Guidance, <http://bit.ly/2jpUR6i>.
- California Health and Safety Code, § 25270.8, § 25510, <http://bit.ly/2jtbkWX>.
- California Labor Code, § 6409.1 (b), <http://bit.ly/2j26HjC>.
- California Public Utilities Code, § 7673, <http://bit.ly/2ivtkR7>.
- California Water Code, § 13271, <http://bit.ly/2jq3Ggp>.
- Characteristic Hazardous Wastes, 22 CCR § 66261.21-66261.24, <http://bit.ly/2jq7pKF>.
- Commercial Medical Cannabis Land Use Ordinance (CMCLUO), <http://bit.ly/2jDgM7e>.
- Compassionate Use Act, <http://bit.ly/2f2Koud>.
- Contingency Plan and Emergency Procedures, California Code of Regulations, Title 22, CCR, § 66265.56, <http://bit.ly/2jDoiyG>.
- Detailed Hazardous Materials Incident Reports, Code of Federal Regulations, Title 49, CFR, § 171.16, <http://bit.ly/2iAmDZh>.
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