

*Operations Manual*  
*for*  
*Open Circle, LLC*  
*Dispensary Project*  
*9/2/2020*

**Produced By:**



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<b>Project Name</b>	OPEN CIRCLE
<b>Project Location</b>	3188 Redwood Drive Redway
<b>Project Sponsor</b>	Open Circle, LLC 3188 Redwood Drive
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<b>APN</b>	077-202-025
<b>Existing Zoning Designation</b>	C-2 CG (GRBAB)

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## Table of Contents

Industry Analysis .....	8
Summary .....	8
State Regulatory Framework .....	8
Additional Compliance Factors .....	10
Bureau of Cannabis Control (BCC) .....	10
Cal Cannabis Cultivation Licensing (CCC) .....	10
Office of Manufactured Cannabis Safety (OMCS).....	10
Executive Summary.....	11
Project Timeline .....	11
Phase 1 (2020).....	11
Phase 2 (2021).....	11
Phase 3 (2021).....	11
Project Overview.....	12
Summary .....	12
Location Description .....	12
Zoning .....	12
Performance Standards .....	12
Setbacks .....	12
Consent to Inspect .....	12
Maps .....	14
Overview Map.....	14
Assessor's Parcel Map.....	14
Zoning Map .....	16
Jurisdictional Boundaries Map.....	17
Project Management Plan .....	18
Area Plan .....	18
Summary .....	18
Area Plan .....	18
Summary .....	18

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Area Map.....	18
Parking Lot & Parking Spaces.....	18
Adjacent Structures & Properties .....	19
Floor Plan .....	19
Energy Use Offset Measures.....	20
Cannabis Safety Program .....	20
METRC Verification .....	20
Floor Plan Blueprint (Level 1).....	21
Floor Plan Blueprint (Level 2).....	22
Customer Intake Process .....	23
Cannabis Safety Program .....	23
Summary .....	23
Chain of Custody .....	23
Distribution-to-Consumer Process Workflow (flowchart).....	24
Safety and Quality Assurance Procedure.....	24
Consumer .....	25
Consumer Dosage Determination and Testing Procedure .....	25
Background Investigation Results.....	25
METRC Compliance .....	25
Summary .....	25
Security Plan.....	26
Summary .....	26
Project Specific Security.....	26
Measures of Security .....	26
Security Map .....	26
Alarms .....	27
Security Cameras .....	27
Exterior Lighting .....	27
Hardening Measures.....	27
Storage .....	27
Storage Room Features.....	27

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Points of Security (Proposed Room Layout) .....	28
Inventory Management .....	28
Prevention of Diversion .....	28
Criminal Activity Reward Reduction Measures.....	29
Project Specific Details:.....	29
Project-Specific Environmental Impact Factors.....	29
Operations Plan.....	30
Summary .....	30
Project Summary.....	30
Business Organization .....	30
Management Team.....	30
Overview .....	31
Business Description .....	31
Mission.....	31
Vision.....	31
Values.....	32
Days/Hours of Operation .....	32
Products .....	32
Project Products.....	32
Sales & Marketing .....	32
Chain of Custody .....	32
Packaging .....	33
Distribution .....	33
Track and Trace Standards.....	33
Transportation .....	34
Consumer Screening .....	34
Consumer Record Acquisition and Retention.....	34
Cultivation/Processing Equipment .....	34
Waste Management Plan.....	34
Labor Plan .....	35
Background .....	35

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Summary .....	35
Administrative .....	35
Staff Screening .....	35
Performance Review Reports .....	35
Labor Management.....	36
Recording & Reporting.....	36
Quality Assurance & Control of Product.....	36
Chain of Custody .....	37
Monitoring.....	37
Testing Procedure .....	37
Grading/Sorting.....	37
Packaging .....	37
Health & Safety .....	37
Job Hazard Analysis.....	37
Injury Illness Prevention Plan.....	38
Hazard Communication Policies .....	38
Emergency Procedures .....	38
Chemical Handling .....	38
Eye Washing Station .....	38
Employee Accident Policies .....	38
Personal Protective Equipment Policies .....	39
Occupancy & Structural Guidelines .....	39
Project Specific Details.....	40
Housing .....	40
Notification of Occupancy & Terms .....	40
Maintenance of Sanitary Facility.....	40
Water Access & Facilities .....	40
Contingency Plan .....	41
Summary .....	41
Project Waste Management .....	41
Project Specific Details.....	41

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Onsite Wastewater/Hazardous Wastes.....	41
Effluent.....	42
Waste Management Standards .....	42
Solid Waste Removal/Recycling.....	43
Water Source .....	43
Hazardous Materials Handling.....	43
Hazardous Material Standards.....	43
Use of Chemicals.....	43
Project Equipment Inventory.....	44
Project Product Inventory.....	44
Chemical Spill Procedure/Handling .....	44
Waste Management .....	45
Glossary of Abbreviations & Definitions.....	46
Other Relevant Sources .....	50

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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 commercial cannabis 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 64 (Prop 64) or the Adult Use Marijuana Act (AUMA), and most recently the Medical Adult Use Cannabis Regulation Safety Act (MAUCRSA).

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

On June 27<sup>th</sup>, 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 merging of these two legislative pieces supports regulatory 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 established 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.

Pre-dating the effectuation of MAUCRSA the following regulatory initiatives paved the organization of the regulatory pathway we are working within and included:

Assembly Bill 243 (AB-243) required 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.

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Assembly Bill 266 (AB-266) addressed 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) addressed 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 27<sup>th</sup>, 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.

## 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 (CCC)

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)

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.

## Executive Summary

The Applicant seeks a Conditional Use Permit (CUP) for a Cannabis Facility to support Retail Dispensary activities within the authority of the County of Humboldt.

Project Sponsor is a Limited Liability Company, held by a single member manager, Eryn Snodgrass. The purpose of the business is to conduct retail activities within the State of California. The business intends to seek approval for a retail dispensary land use permit within the County of Humboldt and a Type 10 State license for Adult-use and retail activities from the Bureau of Cannabis Control.

The current structure is grandfathered in and has been used as a bar, holding liquor license, and would ultimately surrender this license and activities within this building, conditional of the approval of proposed activities.

The project site is supported by two access entry points off Redwood Drive. The sponsor is proposing additional security measures to secure access to the property including, but not limited to, fencing, secured entry way and receiving area. The lot has access to nineteen (19) parking areas currently and the project applicant will not be proposing additional parking.

## Project Timeline

### Phase 1 (2020)

- Obtain Land Use Approval(s).
- Generate Plans for Improving Facility to Meet Specifications of Proposal for 2020.

### Phase 2 (2021)

- Obtain State License via BCC to Support Recreational Activities.
- If required, Implement Building Code Upgrades.
- Implement Additional Security Measures.
- Finish Work to Support Recreational Facility.

### Phase 3 (2021)

- Open Storefront.

## Project Overview

### Summary

The Project concerns Parcel No. 077-202-025 in Redway, California that is seeking permitting for a Type 10 license in consideration of a phased approach to development. The Project currently features a single structure with parking access totaling 13,068 Sq. Ft.

### Location Description

The proposed Project would occur on legal Parcel No. 077-202-025 at 3188 Redwood Drive, Redway CA, in the northeast quarter of the northwest quarter of Section 14, Township 4 South, Range 3 East, Humboldt Meridian.

The Project features one (1) structure with one (1) parking lot designated for facility activities.

The property falls within the allowable zoning and property specification requirements of the local jurisdiction's commercial cannabis approval program.

### Zoning

The property features zoning C-2 and the following characteristics:

- GIS acres: 0.3 acres.
- Coastal Zone: Outside.
- 100 Year Flood Zone: Outside.
- Alquist-Priolo Fault Hazard Zone: Outside.
- FEMA FIRM Flood Rating & Panel Number: Not applicable.

### Performance Standards

#### Setbacks

The proposed facility is approximately 620 feet from the nearest K-12 congregation area, which is outside of and fully complying with the 600-foot setback imposed by the County of Humboldt. This setback requirement excludes any private schools where education is primarily conducted in private homes or rental facilities. This project is setback 165 feet from the nearest church and does not meet the setback requirement for places of public worship. Project sponsor proposes to satisfy reasonable accommodations in its nature of business conduct in efforts to reduce any question of concerns regarding an increase in criminal activity that might impact surrounding businesses and organizations. Sponsor also intends contribute to the solutions related to the reduction of current surrounding existing unlawful activity.

#### 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.

This section hereby grants to the Redway Community Service District (RCSD) the authorization to conduct a monthly compliance inspection of the grease trap with a minimum notice of 48 hours and subject to emergency inspection if needed. The inspection would be conducted by officials during regular business hours (Monday-Friday, 9:00 a.m.-5:00 p.m.), excluding holidays.

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Maps

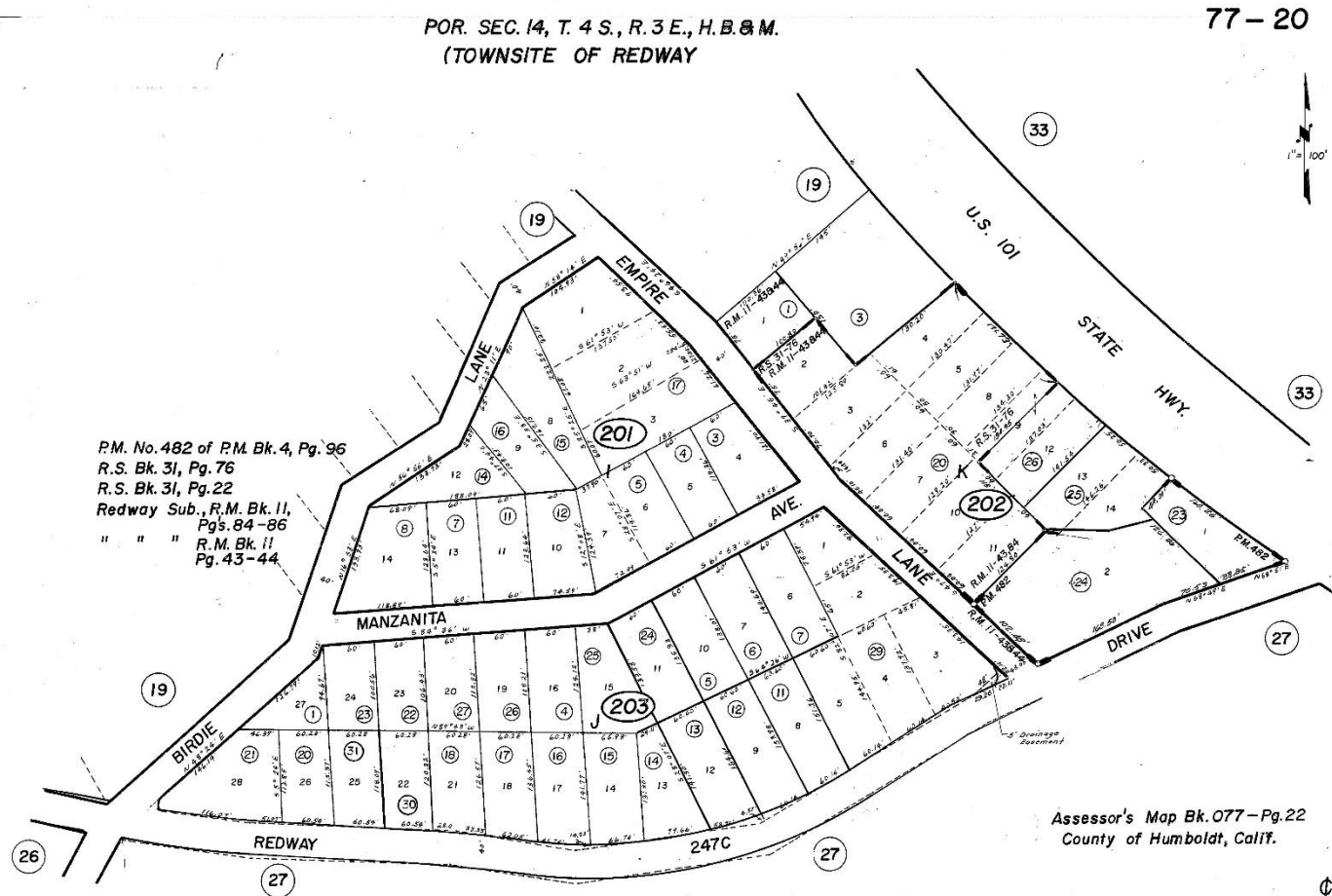
Overview Map

Assessor's Parcel Map

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## Zoning Map



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## Jurisdictional Boundaries Map



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## Project Management Plan

The proposed facility involves a single 4,216 sq. ft. building featuring nineteen (19) parking spaces (for verified consumer customers). The proposed facility is approximately 60 feet from the property line.

### Area Plan

#### Summary

The proposed facility complies with all setbacks for K-12 schools, excluding any private schools in which education is primarily conducted in private homes.

The proposed facility Existing Structure #1 is comprised of seventeen (17) rooms consisting of twelve (12) rooms on the first floor and five (5) rooms on the second floor. The following dimensions and purposes are mentioned in the following Floor Plans and descriptions. 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 consumers or other non-staff members, all medical cannabis product stored or contained outside the dispensing area (room) will be locked always (unless being accessed by staff members).

### Area Plan

#### Summary

The proposed facility, a cannabis dispensary that will be located at 3188 Redwood Dr., Redway, CA 95560, does not comply with all required property setbacks of 600 feet, as set forth in the regulations of the County of Humboldt.

The area surrounding the proposed FACILITY features the following characteristics:

1. Distance to nearest K-6 school: 620 feet.
2. Distance to closest official K-6 bus stop: Not applicable.
3. Distance to closest church: 165 feet.
4. Distance to closest residential/multi-family dwelling: 137 feet.
5. Number of adjacent properties: Four (4).
6. All property setbacks satisfied: Yes.
7. Zoning: Gen Plan: CG (GRBAP); Zone: U.

### Area Map

The proposed facility site area is presented in the following area map, which includes all adjacent properties within a 600-foot radius (as per guidance for regulations provided by the County of Humboldt) and demonstrates satisfaction of all setback requirements (See Plot Plan).

### Parking Lot & Parking Spaces

The proposed facility includes a parking lot, of which the perimeter measures 373 Ft. The lot has one (1) entrance on the north end of the parking lot and one (1) exit on the south end of the parking lot, both entrance and exit connect to Redwood Drive.

The parking lot features nineteen (19) parking spaces on the northwest side of the property, as illustrated in the Site Map above. The facility proposes an ADA compliant parking space along the west wall of the facility.

The parking lot is not shared with any nearby businesses. Street-side parking directly in front of the proposed facility site is shared with adjacent businesses.

### Adjacent Structures & Properties

The proposed facility is adjacent to four (4) properties, as listed below and annotated on the Site Map above:

#### Adjacent Property #1

- Location: Adjacent property #1, Parcel No. 077-202-023, is located on the southeast side of the parcel. It is approximately 220 ft. from Existing Building #1
- Use: Facility Adjacent Structure #1 is used for the function of Business Storefront Complex/Apartment.

#### Adjacent Property #2

- Location: Adjacent property #2, Parcel No. 077-202-024, is located on the south side of the parcel. It is approximately 190 ft. from Existing Building #1
- Use: Facility Adjacent Structure #2 is used for the function of Solar Suites business storefront.

#### Adjacent Property #3

- Location: Adjacent property #3, Parcel No. 077-202-020, is located on the southwest side of the parcel. It is approximately 185 ft. from Existing Building #1.
- Use: Facility Adjacent Structure #3 is used for the function of RV Park.

#### Adjacent Property #4

- Location: Adjacent property #4, Parcel No. 077-202-026 is located on the northwest side of the parcel. It is approximately 90 ft. from Existing Building #1.
- Use: Facility Adjacent Structure #4 is used for the function of Hotel & Lodging.

### Floor Plan

The proposed primary facility building is 4,216 sq. ft. in size and is comprised of seventeen (17) rooms, as listed below:

#### Floor 1:

1. ROOM 1: Existing Front Foyer (Proposed Consumer Intake Receiving Area).
2. ROOM 2: Existing Pool Table Room (Proposed Product Sales Counter).
3. ROOM 3: Existing Bar Area (Proposed Juice Bar Area).
4. ROOM 4: Existing Social Room (Proposed Conference, Meeting, Ancillary Retail).
5. ROOM 5: Existing Commercial Kitchen (Decommissioned; Proposed Clone Storage Area).
6. ROOM 6: Existing Commercial Kitchen (Decommissioned; Proposed Storage Area).
7. ROOM 7: Existing Kitchen Storage (Proposed Delivery Entrance & Household Chemical Storage).
8. ROOM 8: Existing Back Foyer (Proposed Back Entry Foyer).

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9. ROOM 9: Existing Storage #1 Behind Bar (Proposed Storage for Sales Counter/Retail Room)
10. ROOM 10: Existing Storage #2 West of Bar (Janitorial/Equipment Storage).
11. ROOM 11: Existing Men's Restroom (Men's Restroom).
12. ROOM 12: Existing Women's Restroom (Women's Restroom).

#### Floor 2:

1. ROOM 1: Existing Caretaker's Unit (Proposed Caretaker's Unit).
2. ROOM 2: Existing Bedroom (Proposed Caretaker's Bedroom).
3. ROOM 3: Existing Office (Proposed Manager's Office, Vendor Intake, Consumer Records).
4. ROOM 4: Existing Laundry Room (Proposed Secured Product Storage).
5. ROOM 5: Existing Bathroom (Caretaker's Restroom).

### Energy Use Offset Measures

The proposed facility does not have any plans to implement any energy offset measures currently. If required, the sponsor would propose measures to meet this requirement.

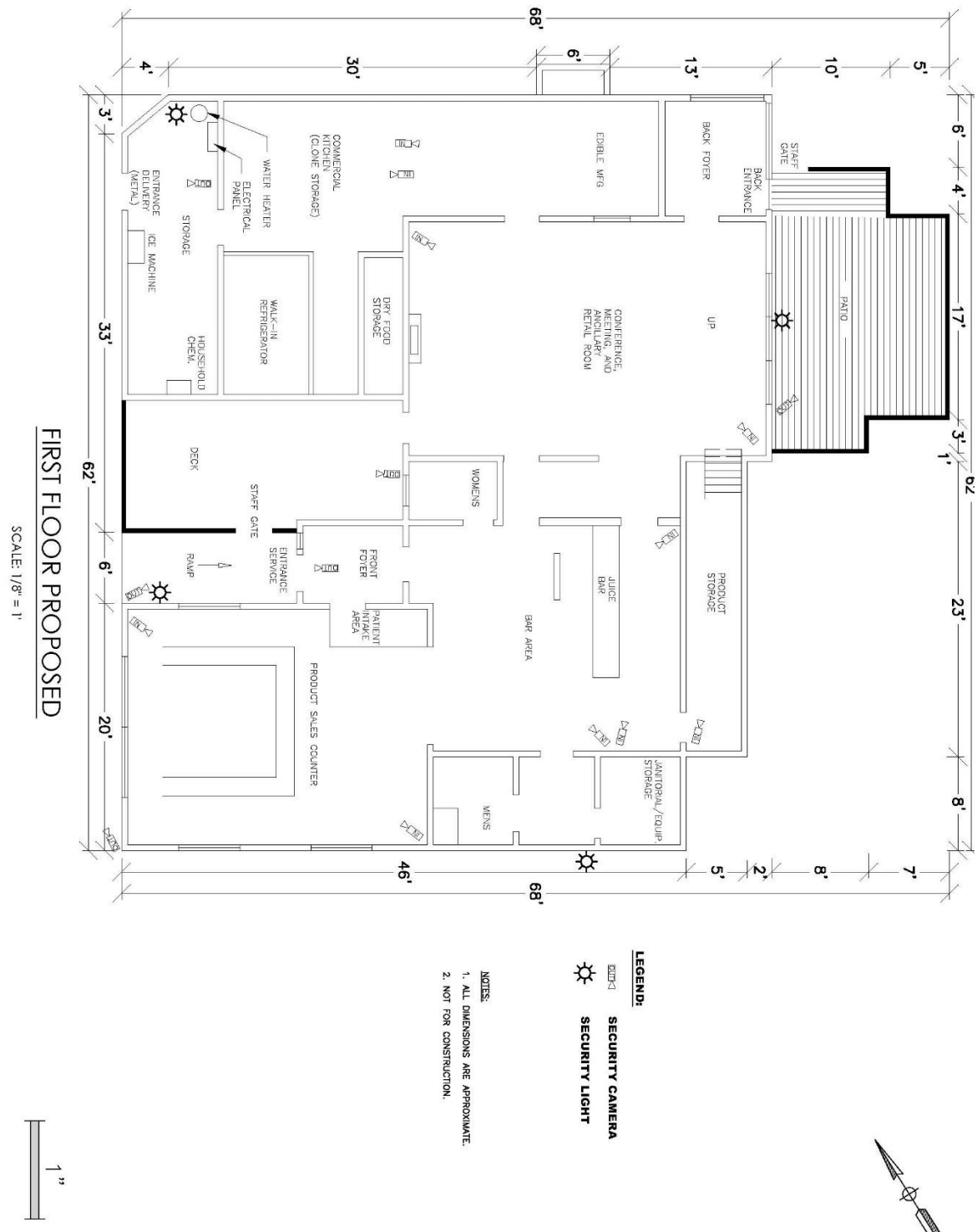
### Cannabis Safety Program

The chain of custody of all medical cannabis product will be tracked via the State's METRC System. Safety and quality assurance measures will include batch testing by an independent, certified laboratory of all product sold to consumer customers.

### METRC Verification

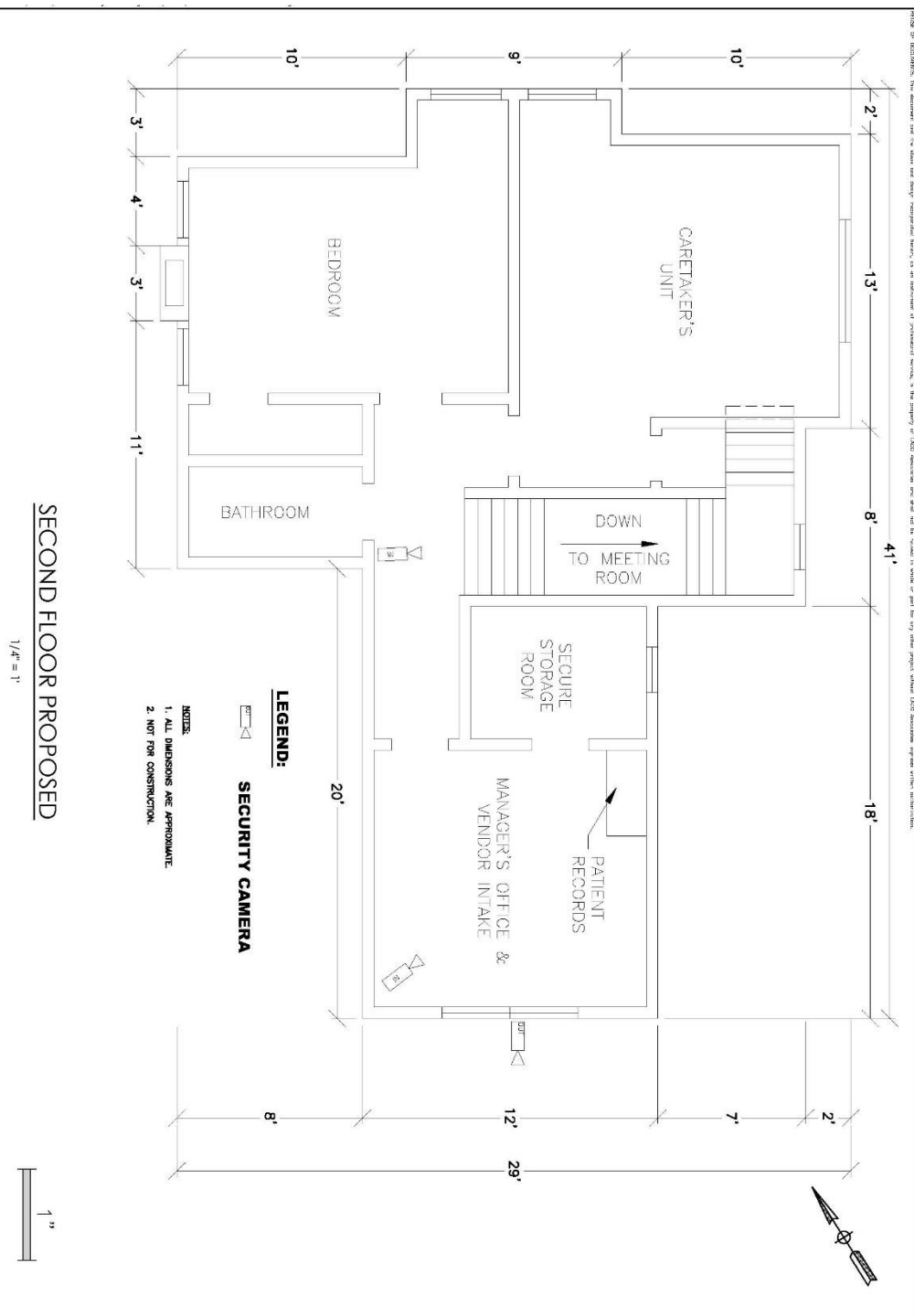
The METRC Verification section of this plan serves as intent to comply with active enrollment and participation in this program.

## Floor Plan Blueprint (Level 1)



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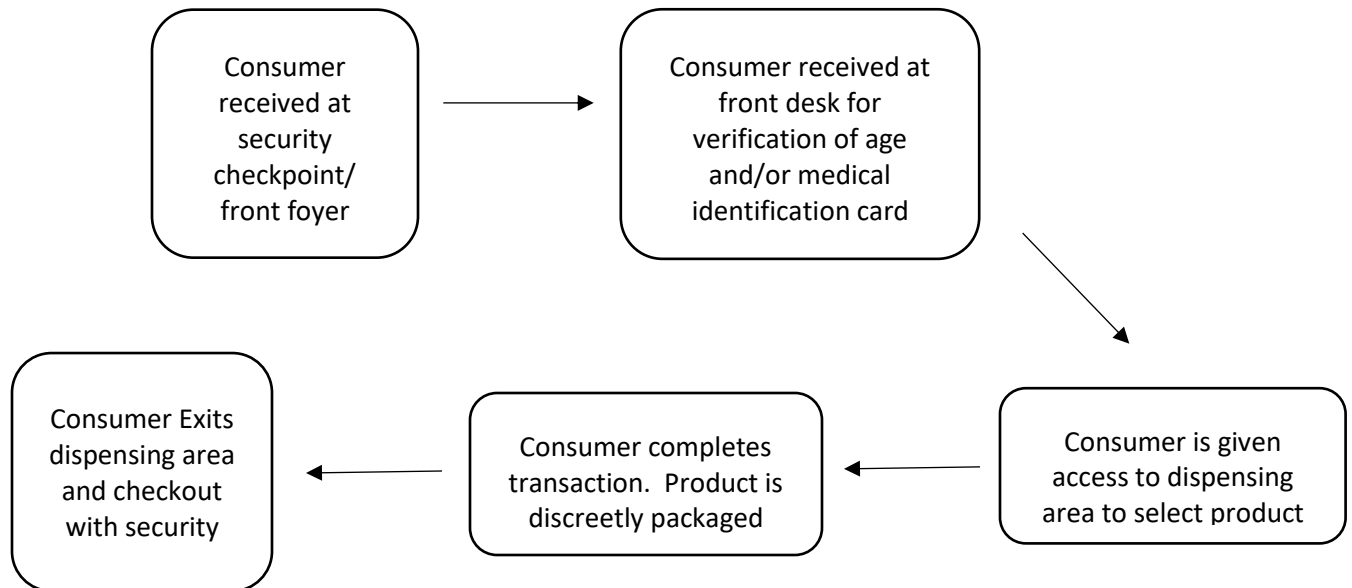
## Floor Plan Blueprint (Level 2)



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## Customer Intake Process

The path of qualified consumer customers through the facility provided on the following flow chart and image.



Consumer customers are under continual video surveillance when on the site or within Existing Structure #1.

## Cannabis Safety Program

### Summary

The Cannabis Safety Program (CSP) for the proposed facility 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.

### 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 sales contract for product(s).

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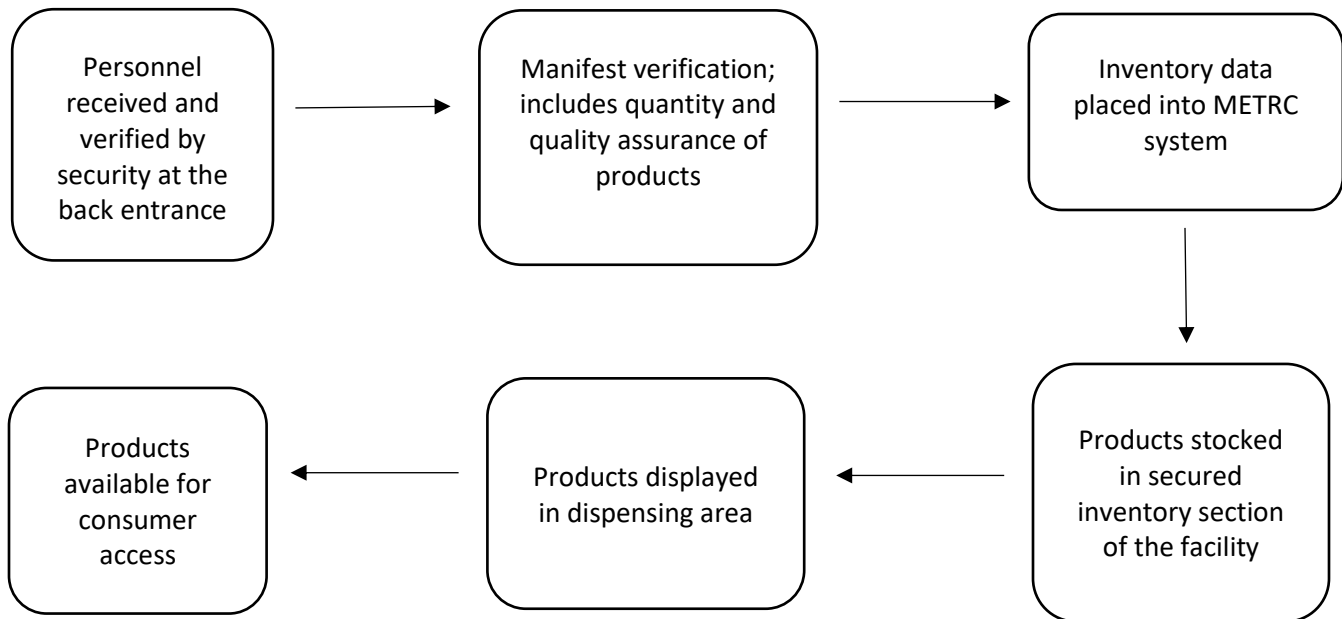
Step 5: Verify product testing certification that meets consumer safety standards.

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 METRC system.

#### Distribution-to-Consumer Process Workflow (flowchart).



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

##### Methods

- Security, on-going surveillance, and alarm system.
- Staff background check and safety training.
- METRC system compliance.
- Product testing verification.
- Packaging and labelling verification.

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## Consumer

### Consumer Dosage Determination and Testing Procedure

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

## 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.

## METRC Compliance

### Summary

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

The applicant will maintain reporting within the METRC system to track all incoming and outgoing transactions in accordance with the State and County regulations.

## Security Plan

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

### 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 facility will reduce criminal activities and would include the following measures: Exterior lighting, alarms, security cameras, and optional hardening measures.

### Project Specific Security

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

1. Consumer verification checkpoint: Consumers will be received at initial security checkpoint. Consumers will then be received at front desk for verification of age and/or medical identification card.
2. Video cameras: The proposed facility employs twenty (20) video cameras capturing motion-initiated video during continuous hours. Recordings are archived and retained for a minimum of ninety (90) days.
3. Alarms: Alarms have been 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 is fenced around the property perimeter. Perimeter fencing is six (6) feet in height. The Sponsor proposes installing automatic lockable gates at both entrance and exit of the parking lot.

### Measures of Security

Several security measures would be involved in the comprehensive protection of medical 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

### Security Map

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

## Alarms

The proposed facility 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.

## Security Cameras

The facility will maintain full compliance with § 5044 of the BCC Regulations. Currently the site is equipped with surveillance that will need to be upgraded prior to execution of operations.

The proposed facility features twenty (20) security cameras in the locations displayed in the Security Map. Cameras shall remain in the On mode continuously 24 hours per day and at a minimum of 15 frames per second (FPS). The physical media or storage device on which surveillance recordings are stored shall be secured in a manner to protect the recording from tampering or theft. Surveillance recordings shall be kept for a minimum of ninety (90) calendar days.

## 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 which can be used as an emergency exit. The windows will be connected to the Advanced Security Systems, as shown on the Floor Plan/Plot Plan. The premises are partially secured and encircled by an six-foot 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 medical cannabis product not on display in the dispensing room. During non-business hours, all medical cannabis products will be stored in secondary containment within the secure Storage Room.

## 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.

## 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)
- Front Foyer (2 Cameras)
- Consumer Intake Area (Camera)
- Product Sales Counter (2 Cameras)
- Juice Bar Area (2 Cameras)
- Bar (Camera Out)
- Conference Meeting/Ancillary Retail Room (2 Cameras)
- Commercial Kitchen/Clone Storage Area (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)

## Inventory Management

A rigorous system of recordkeeping and reporting would be facilitated to adhere to the State's METRC system 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 METRC System.

This would occur under the oversight of the CDFA, in congruence with METRC system. Additionally, retail outlets would be informed of expected delivery quantities. This would include packing slips, tamper-evident seals, verification of credibility, liability coverage, and manifests provided by licensed transporters.

## 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:

- Ongoing surveillance.
- Alarm system to protect the facility.
- Perimeter fencing and secured access.
- Identification verification.

## Project-Specific Environmental Impact Factors

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

<input 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 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 checked="" type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Noise
<input 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

Prepared for Open Circle, LLC by AgDynamix, LLC (September 2020)

## Operations 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.

### Summary

The Operational Plan details use of the organization's resources in pursuit of the strategic plan. It prescribes specific activities and events to be undertaken to implement strategies. It is a plan for the day-to-day management of the organization (encompassing a one-year period). An operational plan should not be formulated without reference to a strategic plan. Operational plans may evolve from year to year with business growth. The chief executive, lead staff, and third parties of or for the organization often produce the Operational Plan.

The products produced by the Project would have the primary designated use of the treatment of consumers with varying ailments. Cannabis products would be distributed to qualified cannabis consumers via wholesale outlets and retail dispensary locations.

### Project Summary

The organization of the Project Sponsor, Open Circle, LLC. is comprised of a single member, Eryn Snodgrass. The proposed facility will operate business activities from Monday thru Sunday, 8:00 am to 8:00 pm on two (2) working shifts and will be open to the public during the hours of 10:00 a.m. and close at 7:00 p.m. Open Circle, LLC is expected to employ eight (8) persons total, with up to four (4) staff members per shift of up to 6 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 medical cannabis product will be tracked via the State's METRC system to minimize the threat of theft or diversion. Consumers will be screened, validated, and registered via a thorough process that complies with all state, county, and local regulations. Consumer records will be acquired and handled only by qualified staff and retained in compliance with federal HIPAA regulations. All chemicals will be stored in fully sealed containers within a secure area of the proposed facility and accessed only by authorized staff.

Because no cultivation or processing will occur at the proposed facility, no equipment will be required for these purposes.

### Business Organization

Open Circle, LLC is a sole member Limited Liability Company (LLC) operating under entity number 201701210336 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

Eryn Snodgrass, Managing Member.

## Overview

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

- Member(s): Eryn Snodgrass, CEO; Chief Executive Officer.
- Days/hours of operation: The proposed facility will be open for business Monday thru Sunday from 8:00 am to 8:00 pm and will be open to the public during the hours of 10:00 a.m. and close at 7:00 p.m.
- Staff shifts: The proposed facility will maintain two (2) Staff shifts during working hours. Each shift involves up to but no greater than four (4) staff members, including a manager/supervisor.
- Regulated chemicals storage: Storage and procedures regarding use of regulated chemicals at the proposed facility is documented in onsite MSDS binders.
- Effluent discharge: No effluent other than human waste and minimal sanitation agents applies.
- Staff screening process: All staff members are thoroughly screened for their qualifications, including professionalism, education, and business ethics. This includes a criminal background check. Details of the Staff Screening Process will be available via the company's internal hiring processes and procedures.
- Medical cannabis product tracking and inventory controls are documented in the *Cannabis Safety Program* below).
- Consumer screening/registration/validation process: Consumers are qualified for admission to the proposed facility via a detailed Consumer Screening Process outlined in the Customer Intake Process, on Pg. 25 of this application.
- Consumer record acquisition process: The consumer records acquisition process is detailed in Customer Intake Process.
- Waste Management Plan. Creation and management of waste by the proposed facility is documented in the Contingency Plan section of this application.

## Business Description

The primary goal of Open Circle, LLC is to conduct retail dispensary activities, within the State of California.

### Mission

Open Circle, LLC is a for-profit/non-profit entity with the mission of providing “medical” or “holistic” grade cannabis products to patients and adult recreational consumers alike in need of treating a myriad of conditions, or simply for state licensed recreational use. The business plans to help stimulate community forums and activities, canna-tourism to the area, and grow the local economy through employment.

### Vision

Open Circle, LLC visualizes a platform of positive and helpful services available to the Southern Humboldt area whilst contributing to the overall economic, social, and cultural growth and continuation of the unique fabric of the community.

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## Values

Open Circle, LLC's values are founded on lifelong vestment into the community, are supported by currently established local business members, and continue to strive to improve the local community by offering new and unique services in efforts to attracting a desirable market of tourism. Open Circle values a wholesome approach to its consumer and to the community by staying involved with local events, engaging in educational outreach, and working with other local businesses.

## Days/Hours of Operation

The proposed dispensary will be open to qualified consumers Monday thru Sunday from 10:00 am to 7:00 pm. Except for the following holidays: Easter & 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.

## Products

Open Circle, LLC will provide specialty cannabis products consisting of flower, concentrates, edibles, and topicals that are tested and assured for quality.

The primary designated use of the cannabis products will be the treatment of consumers with varying ailments. Premium-grade medical 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 medical cannabis.

## Project Products

The retail location intends to distribute a myriad of medical products including, not limited to:

Juice blends, Medibles, Tinctures, Topicals, Bath Infusions, Ancillary Cannabis Cosmetics/Pharmaceuticals, Concentrates, Raw Flower, Vaporization technology, smoking devices and Nursery stock (clones).

## Sales & Marketing

Open Circle, LLC's products would be distributed to cannabis consumers via the proposed Project's retail dispensary location and ancillary marketplaces. 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

Open Circle, LLC 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 responsibility for and liability of products during cultivation, processing, distribution, to wholesale/retail sales.



### Packaging

Products received will meet packaging and labelling standards in accordance with the State's guidelines. 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 at the packaging level of the distribution chain and supplied directly to consumers and retail outlets. Individual consumer labelling must be applied at the producer or packaging level before transfer of ownership in the distribution chain of custody. If the supplier chooses to protect its branding through the Agricultural Commissioner, products would be individually packaged and labelled within the County of origin.

### Distribution

Open Circle, LLC will use its retail location as a secured trading outlet for its products through existing local distribution networks. These distribution networks service retail dispensary outlets that seek licensure within their respective jurisdictions. The established consumer 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

Track and Trace provisions as of June 27<sup>th</sup>, 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.

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(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 will be transported through distribution and through a licensed transporter to trading partners that are authorized to distribute cannabis products to end consumers (when applicable). These transporters will 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.

Transporters will 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.

### Consumer Screening

All potential consumers will be screened at the secured entrance and Identification and age verified.

### Consumer Record Acquisition and Retention

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

### Cultivation/Processing Equipment

No cultivation or processing equipment is maintained or operated at the proposed facility.

### Waste Management Plan

Because the proposed facility will not be involved in the cultivation or processing of medical cannabis products, there will be no waste produced because of these activities. Any other waste produced will be documented and managed according to the facility's *Waste Management Plan*, available in the Contingency Plan stated in this application.

## 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

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) 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 retail industries.

## Summary

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

## 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.

## Staff Screening

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

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

## Performance Review Reports

As required by the County of Humboldt, the applicant shall, on an annual basis, submit a Performance Review Report that shall be reviewed and approved by the Planning Commission.

### Labor Management

The primary organization currently responsible for the recordkeeping of employees (both seasonal and permanent) will be Open Circle, LLC. All records maintained by Open Circle, LLC will be made available upon request.

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 Cannabis Control (BCC).
- 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).
- Occupational Safety and Health Administration (OSHA).
- U.S. Department of Labor (US-DOL).

### Recording & Reporting

All employee records for hours worked and reported will 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).

### Quality Assurance & Control of Product

Quality assurance efforts encompass pre-sale efforts to ensure that sanitation, climate control, dust control, and a variety of environmental standards are in place. Quality control pre-sale efforts include sorting, testing, packaging and labeling, monitoring, distribution procedures, shipping/receiving procedures, inventory, and secured storage.

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.

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- Operating procedures.
- Packaging procedures and protocols.

### Chain of Custody

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

### Distribution

Products received via distribution networks would be verified for solvency, licensure, ethical reporting relations, ability to fulfill contractual deadlines, and meet ethical business standards within the applicable regulatory framework.

### Monitoring

Pre/post-harvest workflow would be verified with supplier(s) with supporting documentation of the condition of the product during its active stage of monitoring.

### 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.

### Grading/Sorting

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

### Packaging

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

### Health & Safety

The first response emergency contact phone number is 9-1-1. Hospitals are Jerold Phelps Community Hospital (707) 923-3921, Redwood Memorial Community Hospital at (707) 726-1001 (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 monitoring, distribution, shipping/receiving, inventory, and secured storage 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:

- 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.

### 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 to any chemicals used onsite.

### 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.

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- 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

Additional PPE provided onsite for any processing labor would include access to gloves, hairnets, and dust masks by employees during sampling, edible manufacturing, and packaging and labeling of edible products.

It is the responsibility of managers/supervisors to ensure that PPE policies are followed during appropriate working conditions.

Staff may be required by State law to employ PPE equipment for the duration of their shifts to ensure no exposure to and/or contamination from a product or against blood-borne pathogens.

#### Occupancy & Structural Guidelines

The general environments in which laborers would work include administrative offices, dispensing area, shipping/receiving, storage areas, and security entrances within the proposed commercial building. The environments in which any commercial retail activity would occur would follow all guidelines (per 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 retail labor and employment referenced within the *Guidelines for Retail Grocery Stores*.

### Project Specific Details

The proposed project intends to support a retail dispensing area and juice bar area. It is expected that structures for this project would support a maximum of six (6) to eight (8) employees during ongoing activities and up to ten (10) to twelve (12) persons at any given time during public operation hours.

### Housing

The Floor Plan includes a Caretaker's Unit that is designated for the Manager of the operation that is not extended to other employees.

Any housing provided to employees for this Project will be subject to CCR regulations found in the *Department of Housing and Community Development* and CA Health & Safety Code § 17038.

### 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 Occupational Safety & Health Administration (Cal/OSHA).
- Department of Industrial Relations (DIR).
- U.S. Department of Labor (US-DOL).

### Maintenance of Sanitary Facility

To help ensure the quality of sold product, a clean working environment would be maintained during the shipping/receiving, inventory, secured storage and dispensing stages of commercial sales activity. Among other benefits, this would prevent potential contamination between receiving inventory and consumer sales. All product would be batch tested prior to sales. In the event of a recall, it would be assured that each batch or variety has not become contaminated during these stages within the dispensing facility

### Water Access & Facilities

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

- Handwashing facilities (Restrooms and Kitchen).
- Onsite potable water (Water Dispensing Station in Public Area).
- Restroom facilities (Designated Restroom Areas).



## Contingency 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 Contingency Plan addresses onsite wastewater and hazardous wastes, solid waste removal and recycling, water production and well construction, hazardous materials handling, commercial product storage, and chemical spill procedures and handling guidelines.

Material Safety Data Sheets (MSDS) for all chemicals stored would be made available onsite. If requested, all equipment maintenance performed onsite would be listed/described. Chemicals pertaining to this project, specifically, would be stored in locked containment within janitorial product storage.

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:

- Household chemicals.
- Human refuse.
- Human waste.

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 determined to measure at 4,216 sq. ft. building, and is currently occupied as a bar establishment off the main stretch of Redwood Drive, in Redway, CA. There is generally a high instance of patrons at the current establishment. Wastes generated by this project include but are not limited to, human waste, human refuse. The use of cleaning agents and products will be minimal.

Chemicals employed include bleach, Windex, and Pine Sol, and are documented in the *Gases and Cleaners Inventory system*, and with supporting *Material Safety Data Sheets onsite*. No additional effluents other than human waste` will be discharged from the proposed facility.

### Onsite Wastewater/Hazardous Wastes

The proposed Project location is supported by Redway Community Services District, Water & Sewer Services.

## Effluent

The proposed facility will discharge human waste. The facility will not discharge any other liquid effluent, aside from 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.

## 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.

### Solid Waste Removal/Recycling

All garbage will be contained within a holding structure and is to be removed no less than once per week. All waste and/or recycling materials will be processed by a permitted solid waste/recycling facility. The facility designated to receive waste products for this project is Recology of Humboldt County for human refuse and Sequential Biodiesel for cooking oil waste removal.

### Water Source

Redway Community Services District supports the project site for all uses.

### Hazardous Materials Handling

The Project is supported by PG&E utilities and does not require fuels to supply the domestic energy needs of the commercial building. Other fuels may be used for small equipment and machinery and may include gasoline, oils, and diesel. All fuels used for equipment if stored on site, 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.

### 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 chemicals (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 business activities.

### Use of Chemicals

Material Safety Data Sheets for all chemicals that will be utilized and/or stored at the proposed facility dispensary and are documented in the *Gases and Cleaners inventory* system, and with supporting *Material Safety Data Sheets onsite*.

### Project Equipment Inventory

- Fryer (Not Intended for Use)
- Ventilation Hood(s) (Not Intended for Use)
- Gas Range (Not Intended for Use)
- Two (2) Ovens (Not Intended for Use)
- Stand Up Commercial Freezer (Not Intended for Use)

### Maintenance

Onsite.

### Project Product Inventory

#### Household Chemicals (Janitorial Storage)

- Bleach: 6 gallons
- Windex: 2 gallons
- Pine Sol Floor Cleaner: 2 gallons

### 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.

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- Title 40, CFR, § 263 esp. § 263.30.
- Title 49, CFR, § 171.16.

### Waste Management

Any waste cannabis byproducts or destroyed products produced by the facility during the course of business will be secured in a cannabis destruction zone under surveillance and blended with sawdust to reduce potential for intended theft and/or diversion.

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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

**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*)

**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

**CEQ:** Council on Environmental Quality

**CEQA:** California Environmental Quality Act

**CFR:** Code of Federal Regulations

**CSLB:** California State Licensing Board

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**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

**DWC:** Division of Workers' Compensation

**EEOC:** Equal Employment Opportunity Commission

**EIR:** Environmental Impact Report

**EPA:** Environmental Protection Agency

**FLSA:** Fair Labor Standards Act

**GAP:** Good Agricultural Practices

**GHP:** Good Handling Practices

**GP:** General Plan

**HIPP:** Heat Injury Prevention Plan

**HSC:** Health and Safety Code

**IIPP:** Injury and Illness Prevention Program

**LLC:** Limited Liability Company

**LRDP:** Long Range Development Plan

**LC:** Labor Commissioner

**MAUCRSA:** Medical Adult Use Cannabis Regulation and Safety Act

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**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  
**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  
**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  
**PPE:** Personal Protective Equipment  
**REI:** Restricted Entry Interval  
**SB:** Senate Bill  
**SDS:** Safety Data Sheets (*See also MSDS*)  
**SOP:** Standard Operating Procedures  
**SWRCB:** State Water Resources Control Board  
**THPO:** Tribal Historical Preservation Office  
**USC:** United States Code

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**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

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## Other Relevant Sources

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- 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/2qHl43T>
- 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>.
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- California Public Utilities Code, § 7673, <http://bit.ly/2ivtkR7>.
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- 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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- Hazardous Material Release Reporting, California Code of Regulations, Title 19, CCR, § 2703, <http://bit.ly/2jigd2U>.
- Health and Safety Code (HSC), § 11362.777, <http://bit.ly/2ivoMdk>.
- Lake and Streambed Alteration Agreement (LSA-1600/1602), <http://bit.ly/2jS5NWV>.
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- National Environmental Policy Act (NEPA), <http://bit.ly/2fSvght>.
- NEPA CEQA Handbook, <http://bit.ly/2ivnyPg>.
- Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, <http://bit.ly/1AKXsYc>.
- Onshore Well Regulations, California Code of Regulations, Title 14, CCR, § 1722 (h), <http://bit.ly/2iAmbKi>.
- Office of Manufactured Cannabis Safety, <http://bit.ly/2qR3WoO>
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- Pesticide and Pesticide Control Operations, California Code of Regulations, § 6670, Title 3, Division 6, , <http://bit.ly/2iFhG4K>.
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- Regulations for Implementing the Procedural Provisions of NEPA, <http://bit.ly/2ivt84d>.
- Reporting of Incidents Involving Hazardous Materials or Hazardous Wastes, California Code of Regulations, Title 13, § 1166, <http://bit.ly/2jtcX6J>.
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