

Operations Plan
Eel River Produce, LLC; APN 209-331-002

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I. INTRODUCTION

Applicant Eel River Produce, LLC (“Eel River Produce”) is simultaneously applying for four (4) Zoning Compliance Certificate’s and a Special Permit on the land at 1048 Holmes Flat to conduct various commercial cannabis activities including light deprivation and outdoor cannabis cultivation, and nursery.

These applications are being submitted simultaneously with specific common language included in their respective Operations Plans to facilitate Planning Department staff’s understanding of the project in all its facets.

The site is irrigated by a non-diversionary water source of rainwater catchment, with 24, 5,000-gallon rainwater catchment hard poly tanks, totaling 120,000 gallons of hard tank storage. The rainwater catchment is self caught with funnels capturing rainwater directly to tank storage, and from no existing buildings on site.

All supporting environmental documentation for the several permits sought (*e.g.*, LSAA, Water Board registration, Site Plan, etc.) were created addressing all the applicant’s permit types’ requirements as a whole.

7 seasonal workers, which combined with 7 employees, would result in a maximum of 14 people on site during peak harvest activity.

CDFA State licenses have been submitted for this property.

These licenses are as follows:

LCA20-0000055 – MEDIUM OUTDOOR (43,560 SF)
LCA20-0000059 – NURSERY (10,000 SF)
LCA20-0000060 – SMALL OUTDOOR (10,000 SF)
LCA20-0000061 – SMALL OUTDOOR (10,000 SF)
LCA20-0000410 – SPECIALTY MIXED LIGHT TIER 1 (3,200 SF)
LCA20-0000412 – SMALL MIXED LIGHT TIER 1 (10,000 SF)
LCA20-0000413 – SMALL MIXED LIGHT TIER 1 (10,000 SF)
LCA20-0000414 – SMALL MIXED LIGHT TIER 1 (10,000 SF)
LCA20-0000415 – SMALL MIXED LIGHT TIER 1 (10,000 SF)

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II. PROJECT DESCRIPTION

A. Project Site

The project site is an approximately 30.35 acre parcel, approximately half on the Holmes Flat (zoned AE-F) and the other half zoned TPZ, located at 1048 Holmes Flat Road, Redcrest, APN 209-331-002. The AE-F portion is all prime agricultural soils which have been cultivated for up to a century or more, constituting approximately fifteen acres, allowing for approximately three acres of prime agricultural soil cannabis cultivation. The site presents no issues of any type as to setbacks, slopes, run-off, erosion, water quality or other county-ordinance or other regulatory agency related issues.

The site is irrigated by a non-diversionary water source of rainwater catchment directly to tank storage, with 24, 5,000 gallon rainwater catchment hard poly tanks, totaling 120,000 gallons of hard tank storage. This tank farm will completely supply and irrigate the cultivation on site. An additional 50,000 gallons of water storage will be installed to meet the irrigation needs at full buildout. Annual water use at total buildout for the cultivation areas is estimated at 169,500 gallons. Annual water use for the nursery is estimated at 19,000 gallons. Seven employees are needed for the operation, with five in the cultivation operation, and two in the nursery. Harvest product will be fresh frozen and taken off site. Processing occurs off site. PG&E supplies power to the site.

Holmes Flat Road is a public road maintained by the County of Humboldt; the parcel is approximately five miles from Highway 101, all paved.

B. Multi-Use and Two-Phased Project

1. Related Uses on Same Parcel

Outdoor Cultivation will consist of 80,000 square feet of Full Sun and almost one acre (43,200 ft²) of Light Deprivation. One acre of cultivation is available by virtue of the parcel's zoning (CMMLUO § 55.4.6.1(b)(2)), with the 80,000 further square feet authorized via the Ordinance's RRR program (§ 55.4.6.5.9(d)). Nursery operations will consist of outdoor propagation (§ 55.4.7.1). No processing occurs onsite.

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2. Two-Phased Project

The project is proposed as follows:

- I: Permit all land uses sought with the Special Permit of 43,200 SF of Light Deprivation Cultivation.
ZCC for 40,000 SF of outdoor cultivation allowance from RRR;
ZCC for 10,000 SF Nursery; and
- II: Allowance of the remaining 40,000 SF of RRR outdoor cultivation.

This Operations Plan addresses all operations for all permits and their land uses sought.
The permits sought are as follows:

<i>Land Use Type</i>	<i>Permit</i>	<i>Sq. Ft./Notes</i>	<i>Ord. §</i>
Phase I			
Light Deprivation Cultivation	SP	43,200 sq. ft.	55.4.6.1(b)(2)
Outdoor Nursery	ZCC	10,000 sq. ft.	55.4.7.1
Outdoor cultivation	ZCC	40,000 SF via RRR, on remaining 20% of site's prime ag soils	55.4.6.5.9(d)
Phase II			
Outdoor cultivation	ZCC	40,000 SF via RRR, on remaining 20% of site's prime ag soils	55.4.6.5.9(d)

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III. OUTDOOR FULL SUN OPERATIONS PLAN

A. Introduction: Prime Ag Soils, Agricultural Operations, and Acreage Rotation

The site's prime agricultural soils are approximately fifteen acres in size. Of this, approximately two acres will be annually cultivated with a mix of vegetable row-crops including beans, various squashes, tomatoes, sunflowers, etc., and up to the permitted limit, which is 65,340 square feet of row-crop cannabis and 43,200 SF of outdoor light deprivation greenhouse cannabis, 40,000 SF of outdoor cannabis, and a 10,000 SF nursery in Phase 1. The project authorizes the receiving portion of the RRRs from APNs 511-191-003 (PLN-13290-ZCC) and 522-025-005 (PLN-2019-15674) totaling 40,000 square feet.

An additional two RRR entitlements will be permitted separately for APN 104-212-013 (PLN-13290-ZCC) and an as-yet determined site. Phase 2 is going to have up to maximum allowable amount for the 20% prime agricultural soils, which Eel River Produce is seeking 40,000 SF of outdoor cultivation via

The remaining approximately 10.5 acres will be annually rested in a rotational pattern. All cultivation areas will be managed for weed control and seed bed preparation.

B. Outdoor Full Sun Cannabis Cultivation Footprint

Outdoor Full Sun operations take place in the northern portions of the large flat floodplain area shown on the Site Plan, and will occupy 80,000 ft² (65,340 SF; see "CA Outdoor"). The outdoor operations are associated with the HCPD RRR program. The entitlements and permits purchased to cultivate on site for Phase 1 are HCPD Apps 15674, HCPD App 11618. These two RRR's are designated on the site plan, and each consist of 20,000 SF of cannabis canopy.

Phase 2 will constitute two more RRR to be onsite to add 40,000 SF of outdoor cultivation going up to the maximum allowable amount per Humboldt County Code. HCPD App 13290 will be associated onto this parcel and the 4th RRR is designated as TBD on the site plan.

C. Outdoor Full Sun Cannabis Cultivation Operations

Outdoor Full Sun cannabis cultivation operations will be conducted between June 1st and November 1st, beginning with the previously-planted winter cover crop being mowed and disked-in during May, which is then plowed 14" deep, worked to a fine seed bed, and then let rest, with the moisture sealed in with a roller. The plants will be full sun grown through the late spring and summer months and will be planted on 8 ft. centers for a total of ~ 1,200 plants. Because of the presence of prime floodplain soils, the plants will require only minor amounts of supplemental hand watering.

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IV. LIGHT DEPRIVATION OPERATIONS PLAN

A. Light Deprivation Footprint

Light Deprivation operations will take place in simple hoop houses set into the native soils and will occupy 43,200 ft² of flat floodplain prime soils as shown in the northern portions of the Site Plan (see “CA #2, Light Dep”).

B. Light Deprivation Operations

Light Deprivation operations will use the use of light deprivation techniques to manipulate harvesting and installing solar powered fans for air circulation. Plants will be planted directly into the soil. Because of the presence of prime floodplain soils, the plants will require only minor amounts of supplemental hand watering. Two runs of light deprivation will be harvested during the season, based on the nursery not being able to be built year-round. If the nursery is eventually built year round with FEMA regulations, there will be three harvests.

Light Deprivation operations will be conducted between April 15th and October 15th. Plants are taken from the on-site nursery and placed directly into native prime agricultural soil inside greenhouses. (The greenhouses will be removed annually.) Vegging takes 2-4 weeks. Light deprivation runs from 7 p.m. until 7 a.m., for a period of 6-9 weeks. Harvesting then occurs, followed by 1-2 weeks in the drying room until the flower is cured for further processing.

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V. OUTDOOR NURSERY OPERATIONS PLAN

A. Nursery Footprints

Outdoor nursery operations consisting of four 24' x 105' hoop houses, totaling 10,000 ft² (see Site Plan, “Commercial nursery propagation (outdoor)”).

B. Nursery Operations Functions

The nursery will produce only clones, immature plants, and seeds for wholesale to licensed cultivators to be used specifically for the planting, propagation, and cultivation of cannabis, or to licensed distributors. 3-5 trips a day will be generated throughout the week for nursery operations from clientele between the hours of 8 am and 4:30 pm.

C. Outdoor Nursery Operations

The four 24' x 105' outdoor nursery hoop houses will have no lighting but may be equipped with solar fans for ventilation.

VI. ON-SITE DRYING OPERATIONS PLAN

The cultivation drying and processing will not be occurring on-site, and instead Eel River Produce, LLC will be implementing fresh frozen harvest techniques and practices with licensed distributors and manufacturers.

The logistics are freezer trucks and wet harvesting. The flowering plants will be individually tagged in METRC with their UID tags. The individual plants weight will be recorded with the UID tag number directly after being cut. Once they are recorded within METRC they are placed on the freezer truck for transportation to the licensed manufacturer thru a licensed distributor. The driver is given a METRC transfer manifest to drive with product to the desired destination.

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VII. PROPERTY-WIDE PLANS AND REQUIREMENTS

A. Land-Based, Water-Related Elements

**1. Onsite Wastewater Treatment System Information and Documentation
(Sewage Disposal Plan)**

There is an existing at least 50-year old onsite septic tank and leach field system that is functioning well. The applicant has requested that Pacific Watershed Associates (PWA) conduct the necessary studies to design a new system with a greater capacity to facilitate the proposed operations. Initial site and soil investigations were conducted on May 13, 2019, and observational water level wells were installed in anticipation of conducting wet weather testing this coming winter. (See “**Attachment A**,” “*Preliminary Onsite Wastewater Treatment System Evaluation*,” July 11, 2019, by PWA Geologist Kathy Moley.)

There are B&B portable toilets for staff onsite and have weekly cleanings for sanitary purposes. Handwashing sinks are near with soap for access to proper handwashing stations.

2. Stormwater Management Plan

The southern approximately 40% of the property is a dense second growth, mixed conifer and hardwood forested hillslope with moderately steep slopes that contain several small first order stream that drain onto the northern 60% of the property underlain by flat, floodplain surfaces (see Site Plan). Once the streams reach the floodplain surfaces there are several small areas of ponded wetlands areas in natural and in man-made depressions, before the runoff is conveyed through a series of straight, man-made Class IV drainage ditches, the largest of which is 3' wide by < 2' deep, and all are well vegetated with grasses and forbes ground cover (see Site Plan). The main east to west drainage ditch is contiguous through the adjacent properties to the east and west and has likely existed across the farmed floodplain surfaces for 100 years or more.

The proposed cannabis farming will take place on the essentially flat floodplain surface to the north of the axial east-west man-made ditch, and all cultivation related activities will occur outside of a 50' buffer zone on the north side of the axial ditch (see Site Plan). The deep floodplain soils will result in minimal surface flow during rainfall events, and when shallow overland flow does occur, there is no soil erosion present on the property due to the dense ground cover of winter grasses that is applied annually to the cultivation areas following harvesting operation in the fall each year.

3. Summary of Specific Measures for Compliance with SWRCB Order

The application is for a proposed new cultivation permit on a property that has had no previous cannabis cultivation, but which has been intensely farmed for feed crops for well over a hundred years.

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Eel River Produce's SWRCB completed and submitted application is 424234 and was submitted on 2/14/2020. The State Water Resource Control Board General Waste Discharge

Requirements and Waiver of Waste Discharge Requirements for discharges of waste associated with cannabis cultivation activities determined that this is a Tier 2 Low Risk site. All application fee's have been paid and are up to date within the SWRCB. The rainwater catchment tank farm was enrolled underneath this General Waste Charge Order. The shallow well was enrolled as well, but no cultivation irrigation will come from this well. Due to the fact it is a shallow well, this would be the only exception for an SIUR. An SIUR is being prepared for the well for domestic uses, and this well follows all forbearance requirements within the SWRCB and DFW.

4. Water Source, Storage Plan, Irrigation Plan and Estimated Use
a. Water Source

This site's full source of irrigation is non-diversionary, consisting of rainwater catchment storage directly caught into tanks. There are 24, 5,000-gallon hard poly rainwater catchment tanks on site collecting storage water. These tanks catch rainwater for all cultivation irrigation, and have sat onsite throughout the winter, catching water for the 2020 season, and are completely full. An additional 50,000 gallons of water will be installed at full buildout, with annual water use estimated at 169,500 gallons. Annual water use for the nursery is estimated at 19,000 gallons.

The rainwater is self caught thru tunnels into the tanks. This rainwater catchment methodology has been documented to the SWRCB for all irrigation use for cultivation.

The long farmer agricultural area of Holmes Flat, as all the properties in the floodplain areas have shallow commercial agricultural wells. The Eel River Produce well is about 78 ft bgs, is cased in an 8" steel pipe with the pump set at 70 ft bgs. There is another shallow well on the property, but it has been sealed shut for a long time. State Division of Water Rights applications for the well will be applied for and include both an Initial Statement of Diversion and Use (ISDU), as well as a Small Irrigation and Use Registration (SIUR). This well, will not be used for irrigation for cannabis cultivation on site.

b. Storage Plan

Given the fertile prime floodplain soils present on the property, the applicant's use of water will be many orders of magnitude less than the commercial animal feed crops that have been grown on the property for over a century. In order to significantly reduce this summer time use of groundwater, a hard poly tank farm consisting of twenty-four 5,000 gallon tanks (120,000 gallons of storage) is positioned to self catch water and store (see Site Plan).

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c. Irrigation Plan

Irrigation needs will be dictated by daily weather conditions and by carefully monitoring soil moisture and plant health. Watering, when necessary, will be applied in the early morning or late evening for the outdoor and mixed light hoop houses via a drip irrigation system and/or hand watering to improve water conservation efforts.

d. Estimated Use (Monthly & Annually, in gals.)

Applicant will be cultivating approximately 123,200 ft² of cannabis, *including* accessory nursery facilities of 10,000 ft². Based on applicant's past experience in legally cultivating cannabis in prime soil floodplain settings, anticipated water use is approximately:

- **638** gallons of water per day in **Outdoor** operations, system and/or hand watering,
- **285** gallons of water per day in **Light Deprivation** operations, and
- **52** gallons of water per day in **Nursery** operations.

Applicant's total irrigation water annual needs are approximately 169,500 gallons of water.

Applicant's total estimated **Outdoor** water usage needs in gallons by month:

Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
					15k	30k	30k	15k	7.5k		

Applicant's total estimated **Light Deprivation** water usage needs in gallons by month:

Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
				5k	10k	10k	10k	10k	7k		

Applicant's total estimated **Nursery** water usage needs in gallons by month:

Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
1k	1k	2k	2k	2k	2k	2k	2k	2k	1k	1k	1k

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5. Site Drainage

There are no natural stream channels or road stream crossings located on the agricultural soils portion of the property, only long-standing man-made Class IV drainage ditches that are well vegetated with grasses and forbes. An east west man-made drainage swale bisects the agricultural soils portion of this and adjacent parcels since at least the 1964 flood, as appears on the Site Plan. Runoff is non-existent for this site; the flat terrain and highly porous soils allow for water to puddle and infiltrate into the floodplain soils, or during heavy rainfall period, result in low velocity shallow overland flow. No road surface erosion or discrete points of sediment delivery are present throughout the entire subject property.

B. Will-Serve Letters

The site is served by PG&E, and has fully functioning on-site water and septic adequate for project demands; there are no applicable water or water service providers for the site. No public utility services are necessary or provided. No will-serve letters are necessary.

C. Premises Operations and Plans

1. Recordkeeping

All required records will be legibly prepared and stored in the administrative hold area required by CDFA, which is a secured area where they are protected from debris, moisture, contamination, hazardous waste, fire, and theft. This administrative hold area is a limited access area, where only those with the correct managerial credentials have access to these documents.

All records specifically required to be kept and maintained for state licensure will be kept for the time period prescribed and, in a manner, allowing for their provision or delivery upon request. This includes all monthly inventory reporting, monthly METRC inventory reports of all items, and any other jurisdictional paperwork.

2. Days/Hours of Operation, Shift Staffing

Employee work hours for all commercial cannabis-related activities are 7 a.m. to 4:30 p.m., Monday through Sunday. Maximum number of employees by activity permitted is five in Cultivation, and two in Nursery, for a total of seven.

3. Energy Plan

The site is currently and historically has been supplied by PG&E grid power. The project is enrolled in the 100% renewable grid power , RCEA's RePower+ program.

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4. Hazardous Materials Management Plan

The project and its related activities will not involve the storage or use of reportable quantities of hazardous materials under Health and Safety Code section 25500 *et seq.*
No Hazardous Materials Business Plan is required.

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5. Light Pollution Control Plan

All structures used for Nurseries and all ancillary uses will be shielded so that no light escapes between sunset and sunrise.

Where located on a parcel abutting a residential zoning district or proposed within resource production or rural residential areas, any security lighting for commercial cannabis activities will be shielded and angled so as to prevent light from spilling outside of the boundaries of the parcel(s) or premises or directly focusing on any surrounding uses.

6. Noise Source Assessments and Mitigation Plan

Noise from cultivation and related activities will not result in an increase of more than three decibels of continuous noise above existing ambient noise levels at any property line of the site. No generators will be used in project operations. A noise source assessment was done by Britt Massaro, Eel River Produces's Compliance Director, over a 24 hour period, and is attached.

7. Parking Plan

On-site parking of twelve spots (two of which will be handicapped-marked) is provided for employees and visitors in existing areas historically used for that purpose (see Site Plan). All employees and visitors will be required to park on-site when conducting business on-site.

8. Pest Management Plan

a. Introduction

All project operations will comply with all pesticide laws and regulations enforced by the California Department of Pesticide Regulation and by the Humboldt County Department of Agriculture. Employees will (i) read and follow all pesticide labels in all storage, use, handling and disposal of any pesticides used, and (ii) use personal protective equipment (PPE) as required and provided for by the applicant.

The applicant will (i) obtain an operator identification number from the Humboldt County Agricultural Commissioner before applying any pesticides, and (ii) provide for and require the use by all employees of PPE, training, and access to pesticide labels and safety information in the proper storage, handling, and disposal of pesticides.

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b. Product Name and Active Ingredient(s) of All Pesticides to Be Applied to Cannabis at Any Time

<i>Product Name</i>	<i>Active Ingredient(s)</i>
Lost Coast Plant Therapy	Soybean oil, isopropyl alcohol, citric acid, peppermint oil
Dr. Zymes	Citric acid derived from fermentation
Zerotol 2.0	Hydrogen dioxide, peroxyacetic acid
Neem oil	Neem oil
Grandevo	Chromobaeterium subtgugae strain Praa4-1
Regalia	Reynoutria sachalinensis
Venerate	Heat killed Burkholderias spp.
Sulfur	Sulfur
Mycotrol wpo	Beaveria Bassiana
Monterey BT	Bacillus thuringiensis sub. kurstaki

c. Integrated Pest Management Protocols

The project employs Biological, Chemical, and Cultural Pest-Management Control Methods, as follows:

i. Biological Pest-Management Control Methods

Once a pest population has been identified and monitored, beneficial insects or other organisms are introduced to control and suppress the continued growth of that population. Biological controls come in the form of insect predators/parasites, fungi, bacteria and more, and are chosen based on their effectiveness at controlling the target pest(s) in the cultivation environment. Examples include (1) cats for rodent control, (2) predator nematodes to suppress root aphids and fungus gnats, and (3) predator mites to suppress thrip, russet mites, and spider mites.

ii. Chemical Pest-Management Control Methods

Chemical controls may include spraying, dunking, and root drenching.

iii. Cultural Pest-Management Control Methods

1. Reduce and disrupt pest habitat around crops; weeding, cleaning, rototilling, mowing, etc.;

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2. Adjusting crop density and planting to reduce pests;
3. Pruning and leafing plants for greater airflow;
4. Monitoring and identify types of pest and population size of pest; scouting and trapping and locations of pest in and around the crop;
5. Utilize proactive attempts to prevent pests and disease rather than reactive treatment; and
6. Sanitation to remove organic and inorganic residues, helping reduce egg/spore populations, deterring overwintering, and minimizing pest control efforts throughout the growing season.

d. Invasive Species Control

Pursuant to planning staff directive, PWA has prepared a “*Biological Reconnaissance, Protocol Level Survey, Wetland Delineation, and Invasive Species Management Plan*” specifically for APN 209-0331-002, which includes focusing on the removal of three particular invasive plant species from the site using measures specific to the species, including subsequent confirmation inspections (7-12-19, section 3.5).

9. Security Plan

All outdoor lighting used for security purposes will be shielded and downward facing.

A commercial security alarm company will be retained, including the use of security cameras. A six-foot chain link fence surrounds the entire cultivation perimeter. A properly licensed armed guard will be present on-site during all cannabis cultivation and processing time periods. All visitors must be accompanied at all times when within the premises.

10. Soils Management Plan

A cover crop of “3G’s Organic Cover Crop,” as well as beans, peas, oats, and clover are planted in winter; nutrient analysis is performed each spring, and soil is amended with organic nutrients as necessary based on analysis.

11. Waste Management Plans

a. Cannabis Waste Management Plan

Cannabis waste generated on the premises will be managed by self-hauling to a fully permitted and manned, (a) solid waste landfill or transformation facility, or (b) composting facility or manned composting operation.

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b. Hazardous Substances Management Plan

Hazardous substances handled on-site include pesticides, fertilizers, fuels and solvents. All pesticides and fertilizers will be stored, handled and used according to manufacturer's instructions. All hazardous substances will be stored in appropriate containers.

c. Solid Waste Management Plan

The project's plan for disposal of project-related solid waste includes managing plant material, greenhouse framing, plastics and tarpaulin used in greenhouse sheathing and coverings, household trash, product packaging and containers, irrigation tubing, pots and similar containers used for propagation and cultivation, lighting, tanks, electrical lighting fixtures, wiring and related equipment, and fencing.

Solid waste generated on the premises will be managed by self-hauling to a fully permitted solid waste management facility.

D. Personnel Safety, Employee Protections

1. Workplace Safety Standards

Standard operating procedures for all employees will include posting of the address of the property and evacuation routes, and emergency phone numbers for first responders and fire safety responders. All workplace safety standards will be complied with, and posted OSHA compliant workplace safety posters will be made available in employee common areas.

2. Employee Safety Protocols and Training

All operations will implement safety protocols and all employees will be provided with adequate safety training relevant to their specific job functions, which may include:

- Emergency action response planning;
- Fire prevention planning;
- Hazard communication policies, including maintenance of Material Safety Data Sheets;
- Materials handling policies;
- Job hazard analyses;
- Personal protective equipment policies; and/or
- Employee accident reporting and investigation policies.

3. Safe Drinking Water, Toilets, & Sanitary Facilities

Employees will at all times have access to safe drinking water, toilets, and handwashing facilities that comply with applicable federal, state, and local laws and regulations. Drinking

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water will be provided either by a potable on-site water supply or by bottled water, or a combination thereof.

4. Sanitation Practices

Employees will comply with the following sanitation practices:

- Operations must be maintained in a clean and sanitary condition, including all work surfaces and equipment;
- Employees handling cannabis will have access to and use Personal Protective Equipment in good operable condition, as job circumstances require; and
- Employees will implement protocols which prevent contamination or mold and mildew growth.

5. On-Site Housing

The project has no on-site employee housing, as none is needed. No employees will live on site.

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6. Agricultural Employer Declaration

The permit applicant declares that it is an agricultural employer as defined in the California Labor Code, Division 2, Part 3.5 commencing with Section 1140, and agrees to comply with all applicable federal, state, and local laws and regulations governing California Agricultural Employer

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