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By Andrew Trippel at 12:07 pm, Oct 26, 2020

**Project Description**

Applicant: T & L Industrial, LLC  
 Address: 3515 Industrial Drive, Santa Rosa, CA 95403  
 APN: 148-041-049 & 148-050-027  
 Zoning (Existing): CG  
 Zoning (Proposed): IL  
 General Plan (Existing): RBS  
 General Plan (Proposed): IL  
 Building Size: 19,500 sf.  
 Lot Size: 1.01 Acre  
 Proposed Use: Cannabis cultivation, manufacturing, distribution

T & L Industrial LLC proposes to operate a Commercial Cannabis Business facility within the site at 3515 Industrial Drive following an amendment to the General Plan and rezoning to IL. The use will be cultivation, manufacturing (Type 6), and distribution.

The entire facility is approximately 19,500 square feet, and the division of space is as follows:

Cultivation: Cultivation Space will occupy 10,202 square feet.

Manufacturing: Manufacturing Space will occupy 3,282 square feet.

Distribution: Distribution Space will occupy 6,016 square feet

The proposed project will include activities permitted by State Cultivation, Manufacturing, and Distribution licenses. The new business planned for 3515 Industrial Drive, in Santa Rosa will offer a combination of cultivation, manufacturing, and distribution.

The project will require multiple applications to the City of Santa Rosa, including General Plan Amendment and Rezoning and a Major Conditional Use Permit.

**General Plan Amendment and Rezoning**

T & L Industrial LLC proposes to amend the General Plan designation for 3515 Industrial Drive from General Commercial to Industry Light, to rezone the parcels to bring them into conformance with the General Plan, and to obtain a major conditional use permit for the operation of a cannabis cultivation, manufacturing, and distribution facility.

The purpose of the General Plan amendment is to modify the current General Plan designations for two project Assessor's parcels. The General Plan amendment is intended to support the proposed development of the two Assessor's parcels, as demonstrated on the attached Site Plan developed by Henderson Architect, Inc. The Assessor's parcel numbers for the two Assessor's parcels included in the General Plan amendment are 148-041-049 and 148-050-027. In addition to the General Plan Amendment, a Rezoning application has been

submitted to rezone the two Assessor's parcels to conform to the proposed General Plan designations.

The site at 3515 Industrial Drive shares a common 145 ft with the property located at 3570 Airway Drive, which is zoned IL. The property is otherwise sited with other General Commercial properties.

Due to the rezoning component, City staff raised the issue of spot zoning. Spot Zoning is the application of zoning to a specific parcel or parcels of land within a larger zoned area when the rezoning is at odds with a city's master plan and current zoning restrictions. Typically, it applies only where an isolated parcel has zoning inconsistent with the surrounding zoning or land uses. However, spot zoning of an isolated parcel *is permissible* "where rational reason in the public benefit exists for such classification." *Avenida San Juan Partnership v. City of San Clemente*, 201 Cal. App. 4th 1256 (2011).

The small size of the parcel is not the sole defining characteristic of a spot zone. Rather, the defining characteristic is the narrowness and unjustified nature of the benefit to the particular property owner, **to the detriment of a general land use plan or public goals.**

Here, the Applicants seek to rezone a General Commercial property to Light Industry. As is clear from the neighborhood context map, the parcel is not surrounded by CG zoning. Rather, the property shares 145 feet of property line with a parcel zoned IL, which is itself a gateway parcel to a large swath of the City's industrial properties. Thus, a rezoning to IL designation would be appropriate given the change in nature of the uses of the surrounding properties. Additionally, the property itself is engaged in commercial and industrial activities already, as are many of the surrounding properties, thus providing further evidence that the nature of activities and uses in the area has changed over time. Finally, the City's zoning code, in Section 20-24.020, indicates that the IL designation is appropriate for "light industrial uses, as well as commercial service uses..." which reflects the activities currently underway thus foreclosing the prospect that the rezoning would leave the parcel incompatible with its neighbors in violation of Santa Rosa's general land use plans or public goals.

#### **California Environmental Quality Act (CEQA):**

The project qualifies for a Class 1 Categorical Exemption under CEQA guidelines Section 15301 in that project is located within an existing structure involving no expansion of use.

The Project qualifies for a Class 3 Categorical Exemption under CEQA Guidelines Section 15303 in that the Project involves a change of use, which will require minor exterior modifications to the structure/site.

Pursuant to CEQA Guidelines Section 15332, the project qualifies for a Class 32 Categorical Exemption as infill development, is located on a site of less than five acres, within City limits, substantially surrounded by urban uses, with no value as habitat for endangered, rare or threatened species, adequately served by necessary utilities and public services, and the project has no foreseeable significant adverse impacts to traffic, noise, air quality or water quality

The Project site includes a fully developed building and a parking lot with fifty-four

(54) parking spaces and has no habitat value and is surrounded by developed parcels with urban uses;

The Project is connected to City water and wastewater services and is served by all necessary utilities and public services;

The Project has provided a Trip Generation and Parking report generated August 20, 2019 that concluded that there will be no significant impacts to City streets and that adequate on- and off-site parking was available to meet peak parking demand;

An Odor Mitigation Plan was prepared and signed by Burke Mechanical Engineering dated August 17, 2019 in compliance with Zoning Code Section 20-46.

## **Major Conditional Use Permit**

The proposed 19,500 square foot building with three separate uses and premises; cannabis cultivation (9927 sf), cannabis manufacturing (3282 sf), and cannabis distribution (1,165 sf), which will require submittal of a Major Conditional Use Permit. The submittal is to permit the uses associated with the single building which proposes hours of operation of 24 hours a day, 7 days a week.

### **Use Permit Project Summary**

Cultivation: Cultivation Space will occupy 10,202 square feet

Manufacturing: Manufacturing Space will occupy 3,282 square feet;

Distribution: Distribution Space will occupy 6,016 square feet.

The proposed project will include activities permitted by state cultivation, manufacturing, and distribution operations. The new business planned for 3515 Industrial Drive, in Santa Rosa will offer a combination of cultivation, manufacturing, and distribution activities.

## **LOCAL AND STATE COMPLIANCE**

### **Dual State Licensing**

T & L Industrial LLC will apply for and receive a business license from the Bureau of Cannabis Control. Additionally, all software and staff training to comply with the Track and Trace system regulated by the California Department of Food and Agriculture will be implemented with ongoing training occurring to ensure up to date knowledge of the staff.

### **Dual EHS Permitting**

To achieve the required dual licensing with the Environmental Health Service (EHS) Department, T & L Industrial LLC will apply for and not begin operations until receiving a permit from EHS. To ensure the project is compliant with EHS requirements, these specific features and procedure will be included in the project:

EHS is requiring toilet facilities that are employee accessible. As such, the project is proposing to improve the existing facilities to meet American with Disabilities Act requirements and will submit plans to EHS showing these improvements when the application is submitted.

EHS is requiring the flooring in areas where cannabis products are stored and in toilet facilities to be smooth, non-permeable and easily cleanable. As such this project will use approved products for flooring in toilet facilities as well as for flooring in the cannabis storage areas.

EHS is requiring a sink dedicated for handwashing with hot and cold water and equipped with mounted soap and a towel dispenser which is easily accessible to employees. A designated hand wash sink will be located within the facility.

## GENERAL PLAN

Development in the project area is governed by the City of Santa Rosa General Plan<sup>1</sup> and zoning ordinance. The project area is entirely developed according to those planning documents. The General Plan outlines the purpose of general plans as follows:

State law requires each California city and county to prepare a general plan. A general plan is defined as “a comprehensive, long-term plan for the physical development of the county or city, and any land outside its boundaries which in the planning agency’s judgment bears relation to its planning.” State requirements call for general plans that “comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” The Santa Rosa General Plan addresses issues related to physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area. The General Plan:

- Outlines a vision of long-range physical and economic development that reflects the aspirations of the community, and provides specific implementing policies that will allow this vision to be accomplished;
- Establishes a basis for judging whether specific development proposals and public projects are in harmony with said vision;
- Allows city departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve and enhance critical environmental resources, and minimize hazards; and
- Provides the basis for establishing and setting priorities for detailed plans and implementing programs such as the Zoning Code, specific and area plans, and the Capital Improvement Program.

Virtually all municipal planning is based on the General Plan and its long-term projections. Demographics, public utility, public services, housing, safety, transportation, open space and recreation needs are forecast dependent on the General Plan. Therefore, amending the General Plan is subject to City Council and Planning Commission review and only occurs three times per year.

The City’s zoning code is used to implement the goals and policies of the General Plan and specifies zoning designations compatible with the General Plan’s land use designations. The

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<sup>1</sup> *Santa Rosa General Plan*. City of Santa Rosa. November 3, 2009.

zoning code further provides allowable land uses and conditional uses (subject to conditional use permits) and defines development standards. Development standards include minimum lot size, density, setbacks, lot coverage, height limits and other criteria compatible with each zoning designation.

The Santa Rosa General Plan contains policies focused on long-term economic growth and development of Santa Rosa. Specifically, the General Plan addresses outlines the City's policies and goals for physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources.

The General Plan outlines the various land use classifications of the City, including Light Industry- the proposed land use classification of the project. Light Industry accommodates light industrial, warehousing and heavy commercial uses. The General Plan outlines the uses that are appropriate to this land use category including auto repair, bulk or warehoused goods, general warehousing, manufacturing/assembly with minor nuisances, home improvement retail, landscape materials retail, freight or bus terminals, research oriented industrial, accessory offices, and employee-serving commercial uses, and services with large space needs, like health clubs. Applicant's proposed business would fit in with the General Plan's Light Industry appropriate uses because of its commercial, general warehousing, research oriented, industrial, and accessory offices operations.

The project area's General Plan designations are shown on Figure XI-1 of the Initial Study/Mitigated Negative Declaration and zoning designations are shown on Figure XI-2. Because the current site designations were not included in the City's Cannabis Ordinance, the project applicant is proposing to amend the General Plan and zoning to be consistent with the proposed use. The existing and proposed designations are:

- General Plan      Existing: Retail and Business Services (RBS)
- Designation:      Proposed: Industry Light (IL)
  
- Zoning:            Existing: General Commercial (GC)
- Proposed: Industry Light (IL)

The project would not physically divide an established community. The project site is located in an area designated for commercial and light industrial uses and is almost entirely built out. The project would repurpose an existing building and would not have any physical impact to the established community beyond those described in this document.

The proposed project would repurpose an existing developed site within a commercial and light industrial area to a new cannabis business. Essentially, this would include changing the use from a furniture retail use to the proposed use. No significant modifications to the existing building's exterior would occur and the developed site would similarly only have minor modifications. The potential physical environmental impacts of this proposed project are relatively few and are discussed at length in the IS/MND. From a traffic and GHG emissions perspective, the project would actually have a beneficial impact to the environment by reducing traffic trips and associated GHG emission. No other physical impacts have been

identified that could not be reduced to a level of less than significant with the incorporation of mitigation.

The project is not consistent with the existing General Plan and zoning designations, as established by the City's Cannabis Ordinance. The proposed project would include a General Plan amendment and rezoning to bring the proposed use into compliance with the Cannabis Ordinance. Thus, following implementation of the GPAM and Rezoning, in addition to complying with the underlying General Plan and Zoning Code designations, the Applicant's proposed business aligns with the policies, principles, and goals of the General Plan. Having cultivation, distribution, and manufacturing in one location, as proposed by Applicant's model, will help foster a compact, rather than scattered, development pattern, which will reduce travel, energy, land and material consumption while promoting greenhouse gas emission reductions citywide in accordance with General Plan goals.

**General Plan Amendment Criteria:**

1. Why do you want the General Plan changed?

*A change to the General Plan and this property's designation is necessary to better utilize the space. Industrial designations better reflect the property's current occupancy as a furniture warehouse, the changed character of the overall neighborhood, and the property's adjacency to one of the City's largest industrial zones. Additionally, given the City's focus on implementing a successful cannabis industry and the related jobs and economic bases, market demand for properties eligible for cannabis land uses has skyrocketed in recent years. In order to make the highest and best use of the property, as well as the most valuable in terms of production, tax revenue, and jobs created, an amendment to the General Plan is necessary.*

2. What changes or events have occurred or what new evidence has arisen since the General Plan was adopted which now warrant a change?

*Beginning in 2015, the City of Santa Rosa began to implement a robust set of regulations governing the legal cannabis industry. The City Council then adopted cannabis regulations and industry development as one of its highest priorities and Council goals. Since then and currently, implementing City's 2016 ordinance and developing the industry and the economic subsector it represents has been a continuing Council goal and policy. Following the City's adoption of its cannabis ordinance, which allows for all cannabis uses to locate in industrially-zoned parcels, demand for those properties has skyrocketed.*

*Following the 2017 Tubbs fire, the area surrounding the subject parcel has suffered a precipitous loss of productive properties. The Kmart property once provided an economic anchor for the neighborhood, but, following its destruction, the neighboring businesses have suffered tremendously. Additionally, given the restrictions on retail operations imposed by COVID-related state and local health ordinances, as well as the significant restriction in consumer spending, retail is no longer a profitable enterprise. Rezoning and amending the general plan from retail and business services to allow for industrial uses aligns the property with its neighbors, as well as the actual current intensity of use of the building.*

3. Have detailed neighborhood plans or other studies revealed the need for a General Plan amendment? (Note: Please reference the recent Real Estate market analysis to support this specific request.)

*Professional demand studies show less than 5% vacancy in industrial spaces in Santa Rosa, with just over 500,000 square feet of available industrial space. Ideally, the City would have a higher vacancy rate to facilitate negotiating power of lessees, as well as encouraging a variety of uses, sizes of operations, and market mix. Amending the General Plan for this property will provide an additional 20,000 square feet of industrial zoning- a nearly 4% increase in available industrial space.*

4. Describe the effect the proposed change will have on the surrounding uses. Describe how the proposed change will affect achievement of the General Plan in this and the surrounding area.

*The proposed changes will have little to no effect on the surrounding uses. The property is already adjacent to a large swath of industrially-zoned parcels, so rezoning and amending the General Plan will render the property more compatible with its neighbors. Additionally, the intended manufacturing uses are "light" in nature, which is compatible with the overall zoning of the area and neighborhood. Additionally, the property is already a major retail use- not really a neighborhood retail business use. Thus, rezoning and amending the General Plan for light industrial uses will not foreseeably increase the intensity of the property's use nor have any foreseeable effect on the surrounding uses. In fact, given the property's current use as a retail facility, the change to a closed, secured facility that is not open to the public will serve to reduce traffic impacts to surrounding properties.*

Based on the project analysis of the compatibility of the proposed land use and zoning designations with existing surrounding uses, the proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### **General Plan Goals and Policies**

In addition to the above noted criteria, the following General Plan goals and policies are related to the proposal:

LUL-K Protect industrial land supply and ensure compatibility between industrial development and surrounding neighborhood.

EV-B Facilitate the retention and expansion of existing business and provide sufficient land for business expansion and attraction of new employers that utilize the area's existing labor pool.

EV-B-7 Focus business attraction efforts on filling vacancies in commercial and industrial structures. With the Redevelopment Agency and Economic Development and Housing Department, develop incentives for those efforts such as low cost loans for tenant improvements, façade improvements, and new business incubation.

EV-C-2 Establish and inventory of ready-to-go non-residential sites complete with zoning, infrastructure, and environmental clearances.

EV-D Maintain the economic vitality of the downtown, business parks, offices and industrial areas.

## **SITE MANAGEMENT**

**Chief Executive Officer**  
**Chief Operations Officer**  
**Chief Financial Officer**

### **Compliance Team Pacific Expeditors**

Pacific Expeditors is a world-class wholesale distribution, logistics, sales, and consulting services provider for the California market.

Within their corporate ranks, they possess decades of experience in sales, distribution, military logistics, and operations. Their deep bench in California state policy making, government compliance, and public affairs provides their clients with an unparalleled level of insightful expertise. Dependability, timeliness, and unmatched professionalism are their cornerstones.

### **Business Plan**

T & L Industrial LLC will implement a business plan that includes day-to-day operations and how cannabis will be monitored to prevent diversion. See attachment.

### **Management Plan Training**

All staff will receive thorough training on workplace safety, operations, track and trace, and security protocols. In addition to state licensing requirements related to staffing, T & L Industrial LLC will diligently follow all applicable labor and employment laws. All employees hired by T & L Industrial LLC will be over 21 years of age. T & L Industrial LLC is committed to hiring employees locally. Sonoma County and Santa Rosa have a wealth of experienced and dedicated cannabis workforce. T & L Industrial LLC plans to consider residency when making hiring decisions, will promote the job posting locally, will focus on safety training and education, and will use local connections in the cannabis industry to discover new local talent.

## **PROFORMANCE TIMELINE**

The principals on this project have the financial strength to complete the entire overhaul of the building and make this the premier location in California for a cannabis business. Financials of principals will be provided upon request. The estimated improvements will be \$1,500,000 to \$5,000,000.

## **NEIGHBORHOOD COMPATIBILITY**

The location provides an ideal setting for this type of land-use. This project will feature an understated front with no advertising that will ensure neighborhood integration and minimize disruptions. Pursuant to Health and Safety Code Section 11362.768 and Santa Rosa Ord. No. ORD -2017-025 the site is over 600 feet from any K-12 school. This site is discrete yet



has plenty of square foot and dedicated parking to service employees and visitors without creating an impact on other business or traffic flow in the neighborhood. An electric gate that stands high enough to block public vision, was proposed to be installed for more privacy and better security.

The proposed facility is well-suited to house cannabis business operations. The building will be upgraded where necessary to meet ADA compliance standards for persons with disabilities. There is no existing landscape or adjacent structure that would impact visibility, lighting, or security.

## **Stability and Quality of Surrounding Neighborhood**

### **Odor Control Measures**

T & L Industrial LLC shall incorporate and maintain adequate odor control measures such that the odors of Cannabis cannot be detected from outside of the structure in which the Business operates. Operational processes and maintenance plan, including activities undertaken to ensure the odor mitigation system will be kept up to date and functional. This will include staff training procedures and engineering controls, which may include carbon filtration or other methods of air cleansing, and evidence that such controls are sufficient to effectively mitigate odors from all odor sources. All odor mitigation systems and plans submitted pursuant to this subsection shall be consistent with accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors. (Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.80 H)

### **NEIGHBORHOOD ENHANCEMENT**

Quality and extent of improvements to the site, building, and surrounding neighborhoods:

The interior of the building will be completely remodeled in order to satisfy buildout plans for all 3 licenses. We will be upgrading all bathrooms to fulfill any and all ADA requirements.

All exterior doors and casings will be changed out to ensure our security provisions are met. Doors will have exterior reinforced caging as well as all exposed windows to prevent theft or thought of theft. As well as the perimeter of the roof which will be outfitted with a barrier to prevent anyone from staging themselves on the roof to perform a criminal activity.

We will be painting the building to an off white with some accented corporate colors to reflect our brand. Some designer plants and pots will be added to the front areas for aesthetics. As well as a number of large designer planting pots will be strategically placed outside the perimeter of the building for aesthetic purposes.

Environmental benefits e.g. "green" business practices related to energy and/or water conservation:

T & L Industrial LLC is not only a health-conscious organization but also sensitive to environmental concerns and good practices. As a result, we will be installing LED lighting in interior parts of the building to reduce watts. For our cultivation we will be installing the most efficient cultivating light fixtures on the market. These lights have a special controller that

lessens or intensifies as needed for spot under the canopy.

A solar array installation on the roof to reduce carbon footprint will be installed as part of our 5-year plan.

Electric vehicle charging station will be added to the property.

We will be upgrading our landscaping to more drought resistant vegetation and potted plants that retain more water. We will also install water conserving toilets as well as waterless urinals.

Also install faucets with a timed flow and recycled towels for drying hands with an air dryer for those who can go without towel drying. A timed motion light will be installed in all bathroom for power conservation.

Community benefits e.g. employment opportunities, community programs and contributions:

We are huge advocates of charities and social programs that help people in need. There is always a place for us to give back and we feel that locally is the best way to see change in the community. Our business mission statement revolves around the quality of care physically as well as mentally with that said our brand only stands as strong as the giving back we do.

#### **COMMUNITY PROGRAMS AND CONTRIBUTIONS:**

*Aid for Starving Children*

*Veterans Resource Centers of America Redwood Empire Food Bank*

*Community Child Care Council of Sonoma County, Santa Rosa Community Action*

*Partnership of Sonoma County, Santa Rosa California Human Development Corp., Santa Rosa*

These community non-profit organizations speak to the members of T & L Industrial LLC. So we plan to make these three non-profits our focus for giving each year.

T & L Industrial LLC will seek to hire personnel with experience but we also will be looking to train and groom potential bud tenders that can add value to our brand and customer service. We believe a big part of our vision is to educate the public about our desire to spread the benefits of cannabis use, so we are looking to hire as many people that carry the enthusiasm and passion toward the industry.

#### **Community Benefits/Employment Opportunities**

T & L Industrial LLC plans to cover its work schedule with full-time associates eligible for full benefits as much as possible and pay a living wage based on the Sonoma County living wage calculations. In addition, we are committed to hire local and stand together to improve the lives & livelihoods of workers, families, and our community.

#### **Estimated Staffing Levels**

T & L Industrial LLC estimates that there will be at least 10 associates. There will be up to 5 associates at peak operating hours. Shifts will be created to ensure that associates receive adequate breaks. The GM will be present five days a week and will be on call for emergencies. In addition, an outsourced security firm will provide a security guard 24/7.

### **Associate Acquisition**

As a condition of employment, all potential associates must submit fingerprints to an approved Live Scan vendor and pass an electronic background check completed by the DOJ and FBI. We anticipate hiring individuals from the surrounding community and will market its hiring campaigns in order to accomplish this.

### **Associate Training and Education**

All newly hired associates will receive training on all aspects of the business. Staff training will be ongoing, and will cover such topics as: safety awareness, emergency procedures, inventory control, cannabis strains and benefits, and any other job-specific requirements to ensure associates remain compliant with state and local regulations and have opportunities for ongoing professional success.

Weekly associate training sessions will be conducted, which will cover a review of all security and emergency procedures, compliance with state and local regulations, and address any training deficiencies or clarification needed. Associates will not be allowed to work without completing the necessary training. In addition to the company-mandated training, The Company strongly encourages all associates to study dispensing practices and to conduct background research on cannabis in order to fully immerse themselves in this industry. The Company encourages open communication about the industry and best practices.

## **LOCATION REQUIREMENT**

### **Distance to schools**

T & L Industrial LLC complies with all applicable provisions of the Zoning Code and the City Code. T & L Industrial LLC is not located within 600 feet of a school. "School" means any public or private school providing instruction in kindergarten or grades 1 to 12.

## **OPERATIONAL PLAN EMPLOYEE REGISTER**

California employers must report all of their new or rehired employees who work in California to the New Employee Registry within 20 days of their start-of-work date, which is the first day of work. Any employee that is rehired after a separation of at least 60 consecutive days must also be reported within 20 days. Employers who report electronically must submit two files each month that are not less than 12 days and not more than 16 days apart. No report should be submitted if there are no new or rehired employees to report.

Required by law to report the following:

Employer's:

California employer payroll tax account number

Branch Code (complete only if employer was assigned a Branch Code number)

Federal employer identification number

Business name and address

Contact person and phone number

Employee's:

First name, middle initial, and last name.

Social Security number

Home address

Start-of-work date

## **RECORDKEEPING**

T & L Industrial LLC has a recordkeeping plan in place to maintain, update, and store records related to its operations for a minimum of seven years, as required by state law. The recordkeeping plan will allow T & L Industrial LLC to comply with the City of Santa Rosa audits and inspections.

T & L Industrial LLC will monitor and track inventory. Inventory will be monitored with a real-time, web-based inventory control system, which will track information for each piece of inventory from seed to sale or disposal.

The GM will implement and strictly oversee the real-time, web-based inventory control system, which will be accessible by the City of Santa Rosa 24 hours a day, seven days per week. This system will keep meticulous track of all cannabis onsite until the product is either purchased or T & L Industrial LLC transfers it to a licensed company for destruction and disposal. All cannabis will be entered into the inventory system immediately with all identifying information. This includes the registration number of the agent making the entry, date/time, quantity or weight, strain, and batch number.

## **SECURED ACCESS AND SECURED PRODUCT CONTROLS**

T & L Industrial LLC will provide and install a variety of security devices to ensure that only authorized personnel have access to any location where cannabis is stored, so that employees are safe and secure inside T & L Industrial LLC.

All access points from outside of the facility will have both locks and alarms. All perimeter windows and hatches will remain closed and locked with tamper-proof security devices. They will be equipped with perimeter alarms that will sound if there is any breach of these apparatuses. All external doors will require two (2) levels of security verification to open—something known and something held. This security process means that employees will need a key along with a unique access code to unlock the front as well as back external doors. In the event of any theft or loss of cannabis, these devices will also provide a security log of who accessed the doors for any ensuing investigations.

All doors will also be equipped with an alarm that will sound if they are opened without code and key or if they are damaged. Arming and disarming the security system will require an access code. Both the entry alarm and surveillance alarm will notify the monitoring service if a failure is detected in the system, which will be corrected as soon as possible. If the failure prevents security systems from operating, the facility will take additional security measures until it is fixed.

Alarm systems can also be triggered if an employee presses a panic or duress button. These

buttons will be installed in strategic locations only accessible to employees. The panic button should be pressed if there is a theft or breach and the employee or other people would be placed in danger by a loud alarm. The duress button will still notify authorities like a typical alarm, but not make a sound on-site. These security devices will allow employees who are threatened to signal an alarm without escalating the situation.

#### **STORAGE OF CANNABIS PRODUCTS/INVENTORY:**

EHS requires edible cannabis goods be stored in a building designed to permit control of temperature and humidity and shall prevent the entry of environmental contaminants such as smoke and dust. The area in which edible cannabis goods are stored also may not be exposed to direct sunlight. The storage area and product display areas of the facility will meet this requirement through mechanical improvements proposed by our mechanical engineer. Also, no edible cannabis goods will be displayed in an area that receives direct sunlight. The storage area has no exposure to sunlight.

EHS requires that edible cannabis products shall be protected from contamination by storing the products in a clean, dry location, where they are not exposed to splash, dust, vermin or other forms of contamination or adulteration, and at least six inches above the floor. This area must include cleanable shelves. The project storage area will meet these requirements using shelving which gives proper clearance from the floor. Additionally, the daily operating procedures will include janitorial maintenance of the storage area to insure cleanliness.

EHS requires that storage areas must be under continuous video-monitoring and recording and secured in accordance with their Security Plan. All cannabis storage areas will be under 24-hour security camera surveillance with 90-day retention of video footage in compliance with state law.

#### **STORAGE AND WASTE**

All cannabis products and any cannabis waste will be stored in an area secured with commercial-grade non-residential locks, that is not visible to the public, and that prevents diversion, theft, loss, hazards and nuisance according to Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.050 (G.3). All storage and handling of hazardous materials will occur in code compliant control areas. All vendors will be pre-scheduled in advance and must present valid identification. Vendors will only be granted access to the areas required for removal of waste. All waste removal vendors will be required to document and track all waste materials removed from the site.

#### **STATE LICENSE**

A copy of issued State License will be displayed per state regulations.

#### **BUILDING AND FIRE CODES**

T & L Industrial LLC's building site meets standards established by the City of Santa Rosa and the State of California. We will ensure the site meets standards established by the City of Santa Rosa and the State of California. We will ensure ingress and egress as well as ADA compliance is followed at the site. We will ensure there is proper ventilation throughout the building. We will work closely with the building division to complete all the required

documents for the building permits and receive all of the required approvals before commencing operations.

## **SECURITY PLAN**

T & L Industrial LLC's security plan is intended to prevent theft or diversion of any cannabis or currency, as well as to discourage loitering, crime, and illegal or nuisance activities. The site security plan is comprised of several layers of systems and protocols, which are discussed in detail below. All the security systems will be capable of remaining fully operational during a power outage. No weapons or firearms will be permitted on the property. All security measures are designed to ensure emergency access is available in compliance with California Fire Code and Santa Rosa Fire Department standards.

Security surveillance video cameras shall be installed and maintained in good working order to provide coverage on a twenty-four-hour basis of all internal and exterior areas where Cannabis is stored and dispensed. The security surveillance cameras shall be oriented in a manner that provides clear and certain identification of all individuals within those areas. Cameras shall remain active at all times and shall operate under any lighting condition. Security video will use standard industry format to support criminal investigations and shall be maintained for ninety (90) days. All recordings will be easily accessed for viewing, and T & L Industrial LLC will cooperate with all law enforcement investigations, providing video footage upon request. T & L Industrial LLC will be able to view the surveillance remotely at any time.

T & L Industrial LLC shall install a professionally monitored alarm system, which provides T & L Industrial LLC with instant notification of any triggering event. The alarm system will be equipped with a failure notification feature that provides prompt notification to Applicant of any prolonged surveillance interruption or system failure. Additionally, T & L Industrial LLC is able to access the alarm system remotely.

The proposed floor plan includes commercial security doors at all entrances, exits, and access points to restricted areas. The entrances will remain locked at all times with commercial grade 1 security locks and will be equipped with a buzz-in electronic entry system to control access during business hours.

T & L Industrial LLC will at all times operate in a manner to prevent diversion of Cannabis and shall promptly comply with any track and trace program established by the state (Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.050(C)) to ensure that no diversion or loss occurs. In the event of any inventory discrepancies, T & L Industrial LLC will immediately notify regulators and law enforcement within the required time periods. In addition, T & L Industrial LLC will perform a reconciliation of its inventory at least once every 14 days and shall be made available to the California Cannabis Bureau upon request.

## **TRAINING AND RECORDS**

Management will require that employees follow necessary procedures to ensure that cannabis and any related by-products from the project site are not visible or accessible to the public. Every employee will be required to participate in training to learn T & L Industrial LLC's security and safety protocols required for continuous employment. T & L Industrial LLC will

mandate that all employees be well versed in all security procedures. As required by state rules, T & L Industrial LLC will maintain up-to-date and current records related to the cannabis operation. Those records will be stored in a secure manner onsite and will include surveillance vendor contracts with schematics of the security zones, name of vendors and monitoring company, and a list of all current authorized employees with access to the surveillance and/or alarm systems. All surveillance equipment, records and recordings will be stored in a secure area that is only accessible to Applicant's management. Finally, T & L Industrial LLC will update the security plan to comply with any new local or state laws and regulations for cannabis licensing.

### **ODOR**

T & L Industrial LLC shall incorporate and maintain adequate odor control measures such that the odors of Cannabis cannot be detected from outside of the structure in which the Business operates. Operational processes and maintenance plan, including activities undertaken to ensure the odor mitigation system will be kept up to date and functional. This will include staff training procedures and engineering controls, which may include carbon filtration or other methods of air cleansing, and evidence that such controls are sufficient to effectively mitigate odors from all odor sources. All odor mitigation systems and plans submitted pursuant to this subsection shall be consistent with accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors. (Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.80 H)

### **LIGHTING**

Interior and exterior lighting shall utilize best management practices and technologies for reducing glare, light pollution, and light trespass onto adjacent properties and the following standards:

Exterior lighting systems shall be provided for security purposes in a manner sufficient to provide illumination and clear visibility to all outdoor areas of the premises, including all points of ingress and egress. Exterior lighting shall be stationary, fully shielded, directed away from adjacent properties and public rights of way, and of an intensity compatible with the neighborhood. All exterior lighting shall be Building Code compliant and comply with Section 20-30.080 (Outdoor Lighting.)

Interior light systems shall be fully shielded, including adequate coverings on windows, to confine light and glare to the interior of the structure. (Santa Rosa, Cal., ORD-2017- 25, Chapter 20 § 46.80

### **NOISE**

Use of air conditioning and ventilation equipment shall comply with the Chapter 17- 16 (Noise). The use of generators is prohibited, except as short-term temporary emergency back-up systems. (Santa Rosa, Cal., ORD-2017-25, Chapter 20 § 46.80 J)

### **PARKING**

The proposed project has 11 dedicated parking spaces, including one ADA space. The project as proposed complies with the City's parking requirements. The change in use proposed will take place in an existing building, without any enlargement in the space to be occupied by the new use. Parking areas will be regularly monitored by staff for safety and security. Employee

shifts will be staggered to accommodate onsite parking, and employees will be encouraged to utilize biking and public transportation options.

### **HOURS OF OPERATION**

Operations shall be 24 hours per day, seven days a week, per City code.

The proposed project will include all activities permitted by a medical and adult use cannabis non-volatile manufacturing (Type 6) license, including but not limited to the following activities: receiving raw bulk dried materials; light manufacturing and processing of bulk materials; packaging/re-packaging including but not limited to sorting, grading, quality control, labeling/re-labeling, inventory controls; internal testing for quality control; research and development of new products; manufacturing of medical cannabis oils, products and compounds using extraction methods such as but not limited to CO<sub>2</sub> and hexane, as permitted under a Type 6 license; storage of raw materials and manufactured products; commercial kitchen and production of edible products; and administrative space for activities such as financial, administrative, marketing and human resources.

Ethanol manufacturing, also called winterization, is used in many forms of processed foods in which it is necessary to remove lipids from oils. The Applicant will use a three-step Winterization process utilizing ethanol.

### **Controls**

The Applicant will develop plans and institute different types of controls to provide an environment that is designed to eliminate hazards and reduce exposure to risk. The Applicant plans to comply with state and local fire codes and the National Fire Protection Association (NFPA) 30. As such, the facility will be designed to have rated rooms, systems and ventilation to meet the inside storage and handling standards in the NFPA 30 and the California Fire Code (CFC). All storage and handling will be permitted by the City of Santa Rosa Fire Department.

Additionally, the Applicant will implement controls that include but are not limited to engineering controls, safe work practices, administrative controls and OSHA Hazardous Prevention and Controls. Some of those measures include installing sprinkler systems, fire extinguishers, spill management systems, and air quality and ventilation systems.

The Applicant will utilize engineering controls to prevent the release of flammable vapors and eliminate ignition sources from any electrical wiring and equipment. Installing exhaust hoods will make certain that the concentration of hexane vapor is within acceptable standards within the facility.

### **DISTRIBUTION:**

The Company operations will include a licensed distribution area. This will include the procurement, sale, and transport of cannabis and cannabis product purchased and sold between cannabis companies. Operations to include the procurement and storage of cannabis products from cultivators and manufacturers for sale to dispensaries. In addition to their partnership with Teamsters, there will be a classroom built for education and training



purposes. Our distribution center will not only be for distributing but educating others on cannabis, how to use and purchase safely and how to gain skills necessary in the cannabis industry.

Safety is something that can never be taught in excess or stressed enough. There is a large number of adult users that do not know where to receive trustworthy information regarding the plant and our center will be where that is.