

City of Santa Rosa  
AUG 27 2018  
Planning & Economic  
Development Department



August 27, 2018

City of Santa Rosa  
Cannabis Policy Subcommittee  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404

Dear Cannabis Policy Subcommittee Members Ernesto Olivares, Chris Rogers and John Sawyer,

The path for UMMA (United Medical Marijuana Association) to get to our scheduled August 30<sup>th</sup> Cannabis Policy Subcommittee hearing has included the following steps:

- From the inception of our planning in early 2016, UMMA envisioned obtaining state and local approvals for Retail, Cultivation, Manufacturing, and Self-distribution.
- When the state regulations were released that defined 'Microbusiness' as allowing up to four uses under a single permit, the City had not yet determined its process for issuing retail permits. Therefore, UMMA went forward with our Microbusiness Cultivation, Manufacturing and Self-distribution local permit under CUP17-044, which was approved on November 9, 2017. Shortly thereafter UMMA received State Microbusiness License No. M12-18-0000055 for Cultivation, Manufacturing and Self-distribution.
- The City finalized the Cannabis Retail permitting process on or about March 15, 2018 and began taking applications on April 9, 2018. As we were anxious to complete our State Microbusiness license with our Retail component, UMMA's application for CUP18-037, was the first Cannabis Retail application to be submitted to the City.

On August 23, 2018, UMMA received the Agenda and attachments for the August 30, 2018 Cannabis Policy Subcommittee meeting. Upon our thorough review of the City's staff report, Presentation, and Scoresheets for the Industrial Drive/Cleveland Avenue Overconcentration area, we identified significant errors and inequities that we believe warrant your attention.

We at UMMA, LLC at 3535 Industrial Drive are delighted to be working with the City of Santa Rosa on our project for mutual benefit. We have received our preliminary scoring report from the City of Santa Rosa on our submission and believe there has been some significant omissions or misunderstandings in calculating our current scoring which warrant further consideration that we believe will result in changes or modifications to our current scores. We also believe your ranking, selection and scoring process to be

fair when all protocols have been performed and all information has been utilized and applied comprehensively and consistently to all applicants.

Notwithstanding the obvious 600 feet distance restriction which is subject to some discussion, the UMMA team before submitting our application to this committee, performed our own analysis and scored ourselves 92 vs. your preliminary score of 71.1, all using your format, measurements and template:

1. Local and State Compliance (Score of 18 vs. 13)
2. Site Management (Score of 18 vs 11.7)
3. Neighborhood Compatibility (Score of 28 vs 23.1)
4. Neighborhood Enhancement (Score of 28 vs 23.3)

We do not presume to understand the rigor of your processes and only seek a modification or a corrected score if considered appropriate by the committee. Given how deliberate and objective your process is at this stage of the approval process, we would greatly appreciate at a minimum a reconciliation or detailed point summary explanation should your point breakdown be materially different to ours after your consideration of the updated information in this packet. We are committed to your process and will seek to respond timely to any questions or requests for further information before the subcommittee meeting on Thursday morning, August 30<sup>th</sup>. Please see our attached scoring sheets and supporting documentation.

Sincerely,

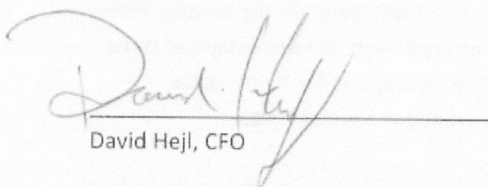
Sincerely,



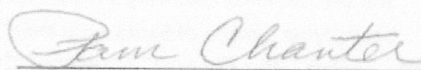
Bobby Sariaslani, Partner



Peter Robertson, Partner



David Hejl, CFO



Pam Chanter, Member, Board of Advisors

### SCORING ANALYSIS: UMMA at 3535 Industrial Drive

CRITERIA	COMMENTS FROM SCORESHEET	RESPONSE from UMMA:
<b>1. Local and State Compliance (20 points max)</b>	"Did not address General Plan policies."	UMMA's preliminary score was 13 points. We submit that with consideration of applicable General Plan policies relative to UMMA's proposed cannabis retail site and existing State Microbusiness License shown below, a score of <b>18 points</b> .
<b>1.i.</b>	<u>STATE LICENSING</u> – UMMA holds Microbusiness License # M12-18-0000055. Obtained following City approval of CUP 17-044 for cultivation, manufacturing and self-distribution portions of the Microbusiness Operation. The state is awaiting approval of CUP 18-037 for inclusion into existing Microbusiness License # M12-18-0000055.	
<b>1.iii.</b>	<u>GENERAL PLAN POLICIES</u>	
	The Santa Rosa General Plan envisions Retail and Business Service-Mixed Use and Neighborhood Shopping Center land use on the project parcel. A cannabis retail, while not specifically addressed in the Santa Rosa General Plan, would be allowed under the project site's CN - Neighborhood Commercial zoning designation, pursuant to Zoning Chapter 20-46, subject to Planning Commission approval of a use permit. The following General Plan goals and policies are applicable to UMMA's proposed cannabis retail use:	
	<i>LUL-I-1</i>	<i>Provide a range of commercial services that are easily accessible and attractive, that satisfies the needs of people who live and work in Santa Rosa and that also attracts a regional clientele.</i>
		At UMMA, we intend to cultivate, process, package, and sell medicinal grade cannabis at our retail store and throughout California. Our retail store will showcase 'UMMA Sonoma' branded products, just as wineries sell their wines in their own showrooms. We will sell UMMA brands as well as high-quality products produced in Sonoma County.
	<i>LUL-J-1</i>	<i>Maintain an adequate supply of employment centers in a variety of locations and settings to ensure the city's continued economic vitality.</i>
		UMMA brands are expected to generate \$100 million in the next 10 years, which will benefit the City of Santa Rosa through tax revenue, hiring local employees, and spending or investing our earned dollars locally.
	<i>UD-D-2</i>	<i>Maintain a uniform setback of structures from the street. Require parking areas to be placed to the side or rear of structures, not in front.</i>
		The project building at 3535 Industrial Drive is located at an appropriate setback relative to other businesses along Industrial Drive. The parking lot is located at the rear of the building and is accessible both from the south driveway off Industrial Drive or from interior driveways to the north and east that are shared by the surrounding businesses in the immediate area.
	<i>UD-F-1</i>	<i>Encourage the sensitive rehabilitation of older structures in neighborhoods to preserve the city's history, improve energy efficiency with consideration to the principles of life cycle costs, and to allow for diversity of architectural styles.</i>
		UMMA will renovate the exterior of the project building with a new façade and install new energy-efficient exterior lighting to boost the overall energy efficiency of the project. The high-end slate façade will blend with the surrounding buildings but add a new, fresh look to the area. The exterior sidewalk lighting around three sides of the building will cast downward to aid in greater visibility and safety for customers, but also to serve as an aesthetically pleasing feature visible from the public right-of-way.

	UD-F-4	<i>Provide visual interest in building, site, and landscape design that avoids the sense of a monotonous tract development.</i>	
		Again, the new slate façade update will add a touch of modernism to the entire property. The clean, sharp lines of the building design and the fresh, new landscaping will be noticed by all customers who enter the driveway and drive past UMMA's retail facility to get to UMMA and a host of other businesses in the surrounding area.	
	EV-A-1	<i>Continue to promote Santa Rosa as the North Bay's premier location for technology, clean/green technologies, and entrepreneurial businesses, which create new products and business models that will attract national and international markets.</i>	
		The City of Santa Rosa is an ideal location for the explosive growth of the legal cannabis market. As the hub of Sonoma County and home to a significant number of cannabis industry entrepreneurs, including UMMA, Santa Rosa will become a regional and state-wide leader in all aspects of the cannabis industry. UMMA will utilize new technologies in our project such as adding an EV Charging Center.	
	EV-A-5	<i>Maintain diversity in the types of jobs available in Santa Rosa to lessen the impact of economic cycles.</i>	
		UMMA LLC will employ C-level executives, mid-management employees, high- to mid-level cultivation and manufacturing experts, and above minimum wage workers. UMMA LLC will hire experienced executives and managers from other industries to work in this new and exciting market as the skillsets for running successful businesses overlap industries.	
	EV-D	<i>Maintain the economic vitality of the downtown, business parks, offices and industrial areas.</i>	
		UMMA LLC's participation in the legal cannabis market will be an important driver in the economic vitality of Santa Rosa in the business parks, office and industrial areas.	
<b>2. Site Management (20 points max)</b>	"Descriptions very brief and not detailed."		UMMA received 11.7 points. We submit with inclusion of Standard Operating Procedures and Performance Timeline detail, a score of <b>18 points</b> .
<b>2.iii. and 2. iv.</b>	<u>STANDARD OPERATING PROCEDURES (SOPs)</u> - UMMA application included summary of UMMA's full SOPs, which include Operations, Management Control, Site Security, Inventory Control Procedures, Non-Laboratory Quality Control, and Transportation Procedures.		
<b>2.v.</b>	<u>PERFORMANCE TIMELINE</u> – UMMA LLC's financing is in place and plans are ready to submit to Building and Fire departments for approval. From a retail product standpoint, 'UMMA Sonoma' is currently positioned to supply a broad range of medicinal products.		
<b>3. Neighborhood Compatibility (30 points max)</b>			UMMA received 23.1 points. We submit with consideration for Security SOP and EV Charging Station, a score of <b>28 points</b> .
<b>3.i.</b>	<u>STABILITY AND QUALITY</u> – This area of town has long been in a need of a facelift. UMMA will substantially upgrade and improve the location. Better lighting and clean surroundings will improve the surrounding neighborhood. Additionally, UMMA has developed a complete SOP for security, which includes detailed descriptions and plans for cameras, alarms, lighting, trained staff, etc. The security measures employed will add to the stability and quality of the surrounding neighborhood by means of deterring criminal activity.		
<b>3.ii.</b>	<u>ODOR CONTROL</u> – Please see the attached Odor Mitigation letter from T.E.P. Engineering.		



3.iii.	<u>SITE PLAN</u> – Please see the attached renderings of the interior floor plan and exterior artist renderings for the proposed project.	
3.iv.	<u>ATTRACTIVE ENTRANCE</u> – Please see attached images and renderings showing entrance, bike rack, and EV charging station.	
4. Neighborhood Enhancement (30 points max)		UMMA received 23.3 points. We submit with consideration for Community Benefits and Site Improvements a score of <b>28 points</b> .
4.i.	<p><u>SITE IMPROVEMENTS</u> - UMMA is providing substantial upgrades to the existing tired façade with additions of energy saving features throughout. This includes high-quality and substantive improvements such as a complete fresh look on all sides of the building, new water efficient landscaping, energy saving lighting fixtures, appliances, and a new bike rack.</p> <p>With a generous 5,000 square feet of floor space, UMMA's retail store will be a true state-of-the-art facility bringing a refreshing environment to the cannabis industry. We take a great deal of pride in setting such a high standard for others to follow. It's smooth curvy white countertops are attractive and easy to keep clean. Our customers will enjoy the spacious and inviting ambience of the interior of our retail store. UMMA LLC will provide privacy for those consulting with an UMMA staff member and a relaxing visit for all our customers.</p>	
4.ii.	<p><u>INTEGRATION OF PROJECT</u> - UMMA LLC's retail location will undergo an extensive remodel of the exterior site. The exterior siding will be of slate encasement giving it a clean, modern and enhanced appearance. New signage, in conformance with the City's sign ordinance will be installed with lighting. The windows will be clear and inviting. Lighting will be installed in the exterior walkways to provide extra visibility and safety.</p> <p>The landscaping will be very simple, yet beautiful and will maintain and featuring a water-free manufactured lawn. We are delighted to beautify a piece of Santa Rosa that needed an upgrade for many years, especially after the fires of October 2017 that ravaged the project area.</p> <p>Vehicular traffic may enter through Industrial Drive on the south or from interior driveways and parking lots to the north and the east that are shared by the surrounding cluster of businesses in the immediate area. UMMA LLC's parking meets the City's requirements, hence, there is plenty of parking available for our customers and employees whether they drive their vehicles or ride their bikes.</p>	
4.iii.	<u>ENVIRONMENTAL BENEFITS</u> – In addition to being located within close-proximity to public transit. UMMA LLC will be using low wattage LED lighting, waterless urinals and manufactured lawn. UMMA will install an EV charging station in our designated parking lot that will be available to the surrounding businesses and the general-public.	
4.iv.	<p><u>COMMUNITY BENEFITS</u> – UMMA LLC is proud to be working with Santa Rosa Community Health to provide education to patients and staff on the medicinal uses of the cannabis plant and will be deeply involved in fundraisers to support its mission to serve our diverse community by providing excellent comprehensive primary care that is accessible to all people.</p> <p>UMMA LLC is and will continue to actively engage with our Medical community by hosting seminars and educational forums for Internal Medicine physicians, nurse practitioners, neuropsychiatrists, various activists, patients and interested persons. These opportunities provide a gathering space and a platform for the community to share knowledge and experiences.</p>	

#### Step 5: Ranking & Selection Process (45 to 60 days)

Pursuant to Section 20-46.080 of the City's Comprehensive Cannabis Ordinance and as amended by urgency ordinance adopted February 6, 2018, the Department has established point based evaluation criteria and selection procedures to avoid an over concentration of Cannabis Retail uses should competing applications be submitted within a 600-foot radius of each other. The purpose of this step is to have the City's Cannabis Subcommittee, comprised of three appointed City Council members, review, score and rank all applicants in this category and to select, at a public meeting, which applications move forward in the process based on their ranking. Prior to finalizing the scores, the Subcommittee may request additional information from an applicant.



srhealth.org

July 23, 2018

Peter Robertson  
UMMA LLC  
P.O. Box 349  
Santa Rosa, CA 95402

Dear Peter:

We at Santa Rosa Community Health (SRCH) look forward to working with UMMA LLC. SRCH is interested in working with UMMA LLC to provide education to the patients and staff on the medicinal uses of the cannabis plant, and UMMA LLC has agreed to provide financial support to SRCH through fundraising events and donations.

We look forward to this partnership to improve the lives of the people in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Naomi Fuchs", written over the printed name.

Naomi Fuchs  
Chief Executive Officer



1083 Jennings Ave Santa Rosa Ca 95401 707 484 9693

July 18, 2018

To: City of Santa Rosa  
Re: Dispensary Application for UMMA LLC  
Location: 3535 Industrial Dr Santa Rosa 95403

Dear Committee;

My name is Andrew Brown and I am the owner of the subject property located at 3535 Industrial Dr., Santa Rosa.

I would like to express my support and give the committee some background information on the applicants and owners of UMMA LLC.

I have known the applicants for more than 40 years and have successfully done business with them and their companies. They are very professional and are driven to bring a level of high quality of goods and services to our city.

In all their projects and developments they have put the community first and provided jobs and benefits to local Santa Rosans.

Their projects have the highest level of quality, success and security and their efforts have received several civic awards. A great example would be the improvements and successful design and build out at 205 Fifth St., Santa Rosa. These applicants are veteran business men and will assure the City of Santa Rosa a dependable stream of tax income, unlike other new unproven applicants.

Finally the applicant has my full support for their intended use of my property and I encourage the City to approve their application for a dispensary.

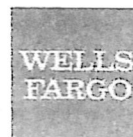
Should you need any further information do not hesitate to call me at 707 484 9693.

Yours sincerely,

Andrew Brown  
Brown Leaseholds



# Platinum Business Checking



UMMA LLC  
PO BOX 349  
SANTA ROSA CA 95402-0349

## Questions?

Available by phone 24 hours a day, 7 days a week:  
Telecommunications Relay Services calls accepted

**1-800-CALL-WELLS** (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: [wellsfargo.com/biz](http://wellsfargo.com/biz)

Write: Wells Fargo Bank, N.A. (114)  
P.O. Box 6995  
Portland, OR 97228-6995

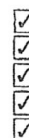
## Your Business and Wells Fargo

Access complimentary resources and tools to help you create or revise your business plan - whether you're an experienced business owner or just starting out. Find out more at [wellsfargoworks.com/plan](http://wellsfargoworks.com/plan).

## Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to [wellsfargo.com/biz](http://wellsfargo.com/biz) or call the number above if you have questions or if you would like to add new services.

Business Online Banking  
Online Statements  
Business Bill Pay  
Business Spending Report  
Overdraft Protection



umma - wf  
...7281

\$1,136,867.63  
Available balance

### Activity Summary

Ending collected balance as of 07/17/18	\$1,136,867.63
Current posted balance	\$1,136,867.63
Pending withdrawals/debits	\$0.00
Pending deposits/credits	\$0.00
Available balance	\$1,136,867.63
Monthly Service Fee Summary	



PG&E's EV Charge Network program is helping to accelerate California's transition to a clean transportation future by offering electric vehicle charger installation at select locations in PG&E's service territory.



### Interested program participants

The EV Charge Network program offers charger installation at workplaces and multi-unit dwellings such as apartment complexes. Keep going to see if your site is a good fit.

### Program vendors

To enable the program, PG&E is looking for companies to provide EV charging service to program participants.





(707) 500-0420

HEAL

RELIEF

CHILL

ACTIVE

PLAY

RELAX



ORGANICALLY GROWN  
AND SOURCED FROM  
THE FINEST GROWERS  
IN **SONOMA COUNTY**.

## CARRY UMMA PRODUCTS

NAME

Your Name

EMAIL

Your Email

PHONE

Your Phone

SUBSCRIBE



GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION.



ummagroup.com  
M12-18-0000055

3187 COFFEY LANE  
SANTA ROSA  
CA 95403



UMMA GROUP, LLC.

# EXPERIENCE UMMA

ORGANICALLY GROWN AND SOURCED FROM THE FINEST GROWERS IN SONOMA COUNTY.



**SOUR DIESEL**  
WITH CACAO  
**PLAY**  
FEEL ENERGIZED

VAPE PEN .5g

**INGREDIENTS:** Cannabis (Cannabis sativa),  
Cacao (Theobroma cacao)\*, Peppermint E.O.  
(Mentha piperita)\*, Black Pepper (Piper nigrum)\*.  
\*Indicates Organically Grown.

**SKU# UMSPVP**  
**PRICE : \$360**  
(pack of 12)



**SOUR DIESEL**  
WITH CACAO  
**PLAY**  
FEEL ENERGIZED

VAPE CARTRIDGE .5g

**INGREDIENTS:** Cannabis (Cannabis sativa),  
Cacao (Theobroma cacao)\*, Peppermint E.O.  
(Mentha piperita)\*, Black Pepper (Piper nigrum)\*.  
\*Indicates Organically Grown.

**SKU# UMSPVC**  
**PRICE : \$360**  
(pack of 12)



**ROYAL KUSH**  
WITH CHAMOMILE  
**RELAX**  
FEEL RESTED

VAPE CARTRIDGE .5g

**INGREDIENTS:** Cannabis (Cannabis sativa),  
Chamomile (Matricaria recutita)\*  
\*Indicates Organically Grown.

**SKU# UMRKVC**  
**PRICE : \$360**  
(pack of 12)



**ROYAL KUSH**  
WITH CHAMOMILE  
**RELAX**  
FEEL RESTED

VAPE PEN .5g

**INGREDIENTS:** Cannabis (Cannabis sativa),  
Chamomile (Matricaria recutita)\*  
\*Indicates Organically Grown.

**SKU# UMRKVP**  
**PRICE : \$360**  
(pack of 12)



License M12-18-0000055-TEMP:

## Cannabis - Microbusiness Temporary License

Record Status: Active

Expiration Date: 10/01/2018

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## **Response to Outstanding Items**

**Project: UMMA, Inc.**

**File #: CUP18-037**

**Address: 3535 Industrial Drive, Ste. A1, Santa Rosa, CA 95403**

### **Odor Control Mitigation Plan:**

See attached Odor Mitigation Plan signed by Andrew Souza of TEP Engineering, licensed engineer license no.M37587

### **Outdoor Lighting:**

UMMA will hire architects and engineers to ensure outdoor lighting complies with the City Code 20-30.080 for Outdoor Lighting. All outdoor lighting fixtures will be: energy efficient, installed at a maximum height of 16 feet, illuminate at least one foot-candle of light at ground level when operating during evening hours, and will not blink or flash unnecessarily. In addition, UMMA will reduce light pollution to adjoining properties by ensuring the fixtures are directed downward and not visible from off the licensed premises.

### **On-Site Consumption and Deliveries:**

Currently, UMMA does not plan to request for on-site consumption. In the event UMMA decided to propose on-site consumption on the licensed premises at a future time, UMMA would submit an application to amend the issued conditional use permit and would include plans for the proposed on-site consumption at that time. UMMA does plan to offer delivery services, as outlined in the Security Plan.

### **Special Events:**

Due to state regulations, permitted cannabis events are currently limited to being held only on county fairgrounds. There will be no special events requiring cannabis permits held at the proposed premises of 3535 Industrial Drive, Building A. At this time, UMMA does not plan to pursue a temporary event license through the Bureau of Cannabis Control; in the event this changes, and based on the locations of the proposed event, UMMA will submit all required permit applications to the city.

### **Storefront, Signage, and Window Treatments:**

One sign with the business name "UMMA" will be installed on the exterior northwest corner of the building on the existing signage platform. UMMA will apply for the proper permits regarding exterior signs upon approval of the conditional use permit. UMMA may install security material on windows to prevent the public from viewing cannabis products and to prevent theft. UMMA will also install their logos on entry doors and windows.

## **MERIT-BASED REVIEW**

**Project: UMMA Inc.**

**File #: CUP18-037**

**Address: 3535 Industrial Drive, Ste. A1, Santa Rosa, CA 95403**

### **1. Local and State Compliance:**

#### **State and County/Regional Regulations**

First and foremost, UMMA, LLC (UMMA) is committed to being an Operator in Good Standing. Our primary goal is to be fully compliant with all local, county/regional, and state laws and regulations. Specifically, UMMA will adhere to all regulations and ordinances, including Santa Rosa Ordinance 2017-025 and Title 16 of the California Code of Regulations as regulated by the Bureau of Cannabis Control. Additionally, UMMA will employ a compliance specialist who will monitor state, city, and county regulations to ensure all regulations are being met. We strive to exceed expectations in the areas of compliance, quality assurance and the safety of our staff, our patrons, and the general public. We set the bar high for ourselves and invite all regulators and customers to judge us accordingly.

UMMA, LLC (UMMA) holds an approved Santa Rosa City Microbusiness permit at 3187 Coffey Lane in Santa Rosa. That permit allows for cultivation, manufacturing and distributor – transport only. Immediately following city's use permit approval, UMMA received Temporary State License #M12-18-0000055. The State is currently undergoing a merging of the Medical ("M") and Adult-Use ("A") designations. When that effort is complete UMMA will hold licenses for both "M" & "A" at this site. After receiving a Certificate of Occupancy from the city, UMMA will apply for our Annual State License.

Our preference is to secure permits for and maintain a Retail store separate from the non-public microbusiness activities at our Coffey Lane site. Hence, UMMA is herein applying for a Retail and Delivery use permit for our 3535 Industrial Drive, Suite A1, Santa Rosa, CA 95403 location. Immediately upon obtaining approval of the use permit, UMMA will apply for an "M" and "A" retail temporary license through the State's Bureau of Cannabis Control.

UMMA plans to sell edible products and will apply for all applicable permits through the Sonoma County Health Department and the CA Department of Public Health. UMMA will post copies of all issued licenses at the entry of the retail storefront.

Lastly, should UMMA choose to participate in any future special events in this or any other jurisdiction, we will secure all required permits and approvals prior to the special event. At present time, we have no such plans.

### **Location Requirement**

The proposed premises at 3535 Industrial Drive, Suite 1A in Santa Rosa is located in the General Plan's Retail and Business Service district and in the CG - General Commercial zone. To the best of our knowledge, there are no other proposed cannabis retailers located within 600 feet of the proposed premises.

The nearest school, Lattice Educational Services, is more than 1,200 feet from our proposed site.

The storefront entrance can be located at one of two available areas of the building. The existing and UMMA's preferred entrance, as shown in our renderings, is on the north side of the building directly adjacent to the handicapped and regular parking spaces. The secondary choice is to use the east facing doors as the storefront entrance that are further from handicapped parking but with an unobstructed view from the right-of-way. We believe that the secondary choice is inferior to our preferred entrance as the building enjoys three side of windows, through which all activities inside the building are easily visible from the public right-of-way. Further, our preferred point of entry fronts onto numerous other businesses, parking lots, and paths of travel for pedestrians and vehicular traffic that provide unobstructed views of the existing northern facing entrance. We look forward to a joint decision on whether the existing entrance meets the intent of the Santa Rosa Cannabis Ordinance No. 2017-025 §20.46.080(D)(5).

### **Operational Requirements**

UMMA will ensure all employees are over the age of 21, and will maintain a database of all current and former employees and volunteers listing their name and identification number. In addition to employee records, UMMA will maintain patient records for up to seven (7) years to adhere to HIPAA regulations, and will maintain sales records for a period of seven (7) years. UMMA will disclose the database of all employees for inspection by any City officer or official.



UMMA will limit entry to serve adults who are over the age of 21 years old and in possession of a government issued photo identification, and to medicinal patients with valid doctor's recommendation who are over the age of 18 years old. In addition to selling cannabis products and as allowed in City and State codes and regulations, UMMA plans to sell cannabis paraphernalia. UMMA has designated 200 square feet devoted to paraphernalia and educational materials.

UMMA will operate daily from 9:00 am to 9:00 pm, seven (7) days per week. Upon entry to the building, a customer will be greeted by a receptionist who will verify they have the required valid identification. A customer may be directed to wait in the lobby area until such time an UMMA Consultant is available.





When a customer is able to be seen, they will be allowed entry into the retail area through the security door. If someone enters the building who is not a customer but an invited guest or distributor, they will be logged into a Limited-Access Area log and will be escorted through the property for the entirety of their visit. The retail area is limited to customers of the dispensary or escorted guests. Upon completion of the sale, customers will exit through the same door(s) from which they entered.

## 2. Neighborhood Compatibility

### Surrounding Neighborhood

#### Fitting Into the Neighborhood

Our proposed site is surrounded by general commercial zoned properties. On a slightly larger scale, our site lies in the middle of fire damaged and destroyed properties - west of the former Kmart site, south of damaged commercial businesses, and east of the Coffey Park neighborhood. Our hope and intent is to create a high-quality retail presence with greatly improved interior and exterior finishes that will enhance the aesthetics of the neighborhood and increase property values. Further, it is our intent and belief that the design, location, size, and operating characteristics of UMMA's retail store are compatible with the existing and future land uses in the vicinity.

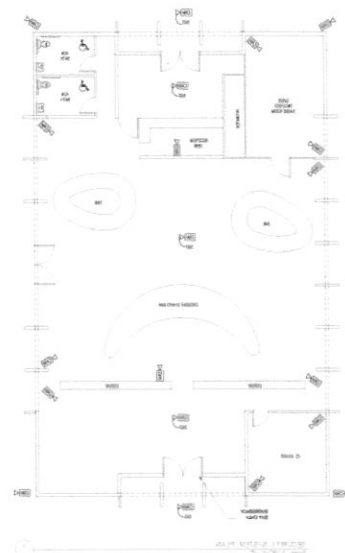
#### Odor Mitigation

See attached Odor Mitigation Plan to describe how odors will be prevented from being smelled outside the licensed premises. We are confident that our plan will prevent any odors from our plan will prevent any odors from our retail establishment migrating to the office uses above our store and to any surrounding commercial neighbors.



#### Enhanced Retail Experience

UMMA will utilize the newest technologies, lighting and design features in its interior to enhance the experience of customers. The floor plan has been designed to allow for customers to have space to view products on display, as well as comfortably spend time with consultants discussing products. UMMA plans to use polished surfaces throughout most of the premises to ensure cleanliness.

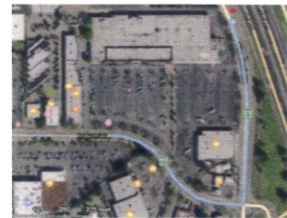


### Clear and Attractive Entrance, Pedestrian Orientation, Bike Parking, & Access to Transit



Our retail storefront will be both attractive and functional. We are providing the requisite number of accessible handicapped and regular parking spaces located immediately outside the designated entrance. Pedestrian walkways are provided on the north, east and south sides of the building. UMMA will appropriately utilize energy saving lighting on the building and at ground level to provide safe pedestrian access to, from and around three sides of the property. Additionally, water efficient landscaping will be added to further enhance the aesthetics of the storefront.

Our retail store is located just east of Cleveland Avenue at Mendocino. It is easily accessed by vehicular traffic from surface streets, by the Mendocino Avenue exit heading north on Hwy 101, or the Hopper Avenue exit heading south on Hwy 101. Santa Rosa City Bus maintains a bus stop on Route 10 at the intersection of Cleveland Avenue and Hopper



Avenue. The bus stops at that location every 30 minutes starting at 10am every day. It is less than an 8-minute walk from our storefront location to the bus stop. Santa Rosa City Bus also connects with the Sonoma County Transit and other Santa Rosa Bus routes at the main transportation hub in downtown Santa Rosa. Our storefront is also located just 1.8 miles from the SMART's Santa Rosa North Train Station at 1500 Guerneville Road. Lastly, UMMA will install a bike rack at its store location for those who arrive by bicycle.



### **3. Neighborhood Enhancement**

#### Site Improvements

The proposed building, located in the CG – General Commercial zone, is immediately adjacent to other commercial retail facilities and will be an ideal fit for the neighborhood. UMMA will ensure the licensed premises exterior grounds are kept clean of trash and free of loitering. A new facade is planned along with new water efficient landscaping.

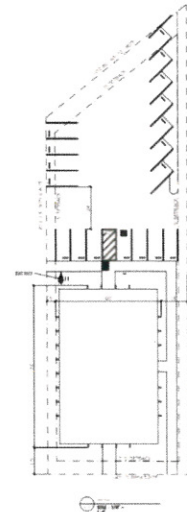
UMMA is planning on adding a new facade on the exterior perimeter using quality gray fiber panels that will greatly improve the aesthetics of the current building.



The driveway, located on the east side of the building, leads customers to a well-lit and easily accessible parking lot. Customers can also enter or leave the parking area from driveways that surround the commercial business to the east



of our storefront and to or from the former Kmart parking lot. In addition to our 17 regular and one (1) handicapped designated parking spaces, there are roughly five (5) street parking spaces along Industrial Drive. UMMA will ensure the pathways to the licensed premises and the parking area are clear of trash and debris and properly lit for the safety and visibility of customers and visitors in the area.



#### Green Business Practices

UMMA will adhere to environmentally friendly business practices and will ensure that energy efficient appliances and water conservation techniques are utilized. UMMA will add water efficient landscaping to enhance the surrounding area of the premises. The new interior will utilize energy saving led lighting fixtures that will provide a well-lit, secure, and aesthetically appealing space.

#### Community Benefits

The owners of UMMA have been involved in the community for 35 years and have employed over 500 staff members throughout the years. The retail store will be staffed



with locals and they will be paid at above minimum wage rates. UMMA will soon be an active member of the Santa Rosa Chamber of Commerce and will engage and support local charitable agencies and events, especially those that relate to healthy living and specifically addressing our opioid crisis, as has been the owners practice for the past three decades.

#### **4. Site Management:**

##### Experience and Qualifications of Principals

Bobby Sariaslani has been an owner and operator of a retail business in downtown Santa Rosa for the last 35 years. Additionally, Mr. Sariaslani has been a medical cannabis cultivator and manufacturer for the past four (4) years.

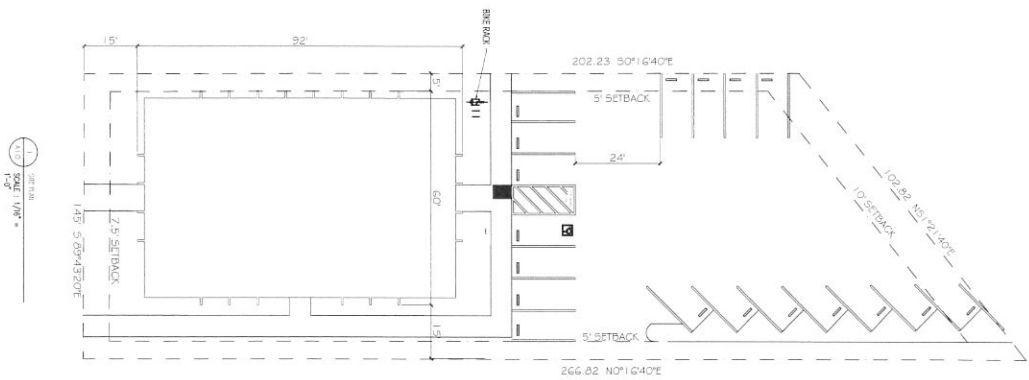
Peter Robertson is a local boy who ran a retail business in Santa Rosa for over 18 years. He transitioned into his current role in the finance and banking industry in Santa Rosa.

Business Plan: The owners of UMMA will hire local individuals with experience in the cannabis retail industry to manage the licensed premises. UMMA plans to have one (1) manager on shift at all times, three (3) sales representatives, and one (1) attendant at the front desk to verify customers. Customers 21 and over with a valid ID, or 18 and older with a valid ID and physician recommendation, will be allowed entry onto the premises. UMMA will only employ persons over 21 years of age. Employees will wear identification badges during operating hours, which includes the employee's picture, name and employee number.

Management Plan: If a nuisance in the surrounding area occurs, UMMA will request the offenders to cease in engaging the nuisance activity and will contact the Santa Rosa Police Department. UMMA will hire security personnel to monitor the grounds to ensure customers are not loitering or consuming products on the premises. Staff will be trained on how to alert security for any nuisances caused inside the building. In addition, UMMA will assign one (1) manager to be the local contact for authorities in the event of an emergency. We are committed to preventing any situation stemming from our retail store from being a detriment to the public interest, health, safety, convenience and welfare to persons, property, or improvements in the vicinity of our storefront.

Performance Timeline: Upon approval of the conditional use permit, UMMA anticipates opening its doors to customers within six (6) months. UMMA anticipates the paperwork to process the anticipated remodel will take four (4) months, and the remodel construction to take two (2) months. UMMA will obtain all necessary permits including, but not limited to, building and fire and make accommodations for all inspections to occur. Upon issuance of a Certificate of Occupancy, UMMA will open the retail storefront to the public.

PARCEL INFO:  
 146-050-021  
 LOT ACRES: .43  
 ZONING: CG-4C  
 THE DISTRICT: 3



BRUNS-SLOT ARCHITECT  
 Ryan Brunslot, Arch.  
 Bruns-Slot Architect  
 Building, CA 94722  
 r@bruns-slot.com  
 (415) 913-9625 cell

NOTES:

NO.	REVISION	DATE
1	1 - 20.08.2015	



PROJECT:  
 TRINANT IMPROVEMENT  
 PROJECT ACRES:  
 0.43  
 146-050-021  
 APN: 146-050-021

SITE PLAN  
 A1.0

AS-NOTED  
 FEET-INCHES





NOTES

MEMBERS: -

510790790 -



APN: 148-050-02

## A2.0

AS-NOTED

FEET-INCHES





1 - 06.08.2014

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PROJECT:  
TENANT IMPROVEMENT  
PROJECT ADDRESS  
3535 Industrial Drive Building A  
Santa Rosa, CA  
APN:148-050-021

# A1.0

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BRUNN-SLOT ARCHITECT  
Rafael Brunnsloti, Architect  
10000 Wilshire Blvd., Suite 1000  
Beverly Hills, CA 90212  
rsloti@brunnsloti.com  
(310) 879-3825 ext.

NOTES:

1. ALL WORK SHALL BE IN ACCORDANCE WITH THE LATEST EDITIONS OF THE CALIFORNIA BUILDING CODE (CBC) AND THE CALIFORNIA MECHANICAL CODE (CMC).

REVISIONS:

1 - 06.2018

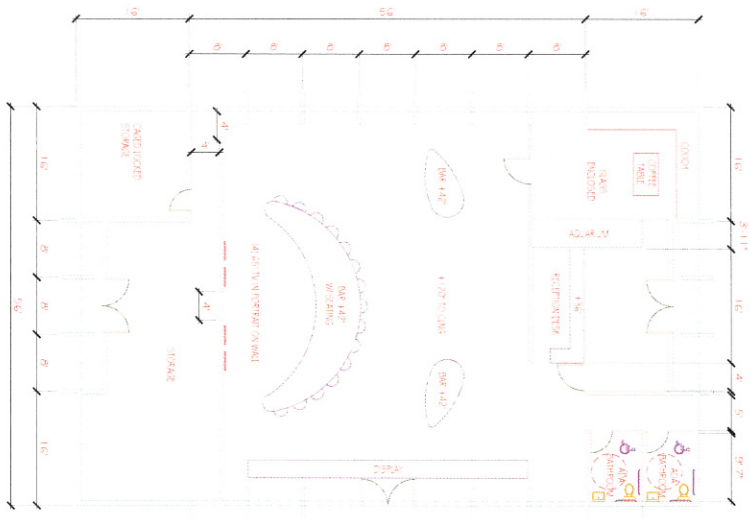


PROJECT: TRUNK IMPROVEMENT  
PROJECT ADDRESS: 10000 Wilshire Blvd., Suite 1000, Beverly Hills, CA  
APN: 145-000-001

PROPOSED FLOOR PLAN

A2.0

AS NOTED FEET-INCHES



SCALE: 1/8" = 1'-0"

June 12, 2018

Re:  
UMMA LLC  
3535 Industrial Drive,  
Santa Rosa, CA 95403  
Cannabis Retail Dispensary  
City of Santa Rosa –  
Conditional Use Permit Application

As required by the City of Santa Rosa's Cannabis – Conditional Use Permit Application, the Owner has hired TEP Engineering to address three items regarding HVAC filtration and noise. These three items are "Storage of Cannabis Products/Inventory", "Odor Control – Engineering Controls" and "Noise".

## Dual EHS Permitting - Storage of Cannabis Products/Inventory

The project as proposed shall comply with the City of Santa Rosa's storage of cannabis products/inventory standards set forth in Zoning Code Chapter 20-46. UMMA LLC will store and display packaged edible cannabis goods in spaces that have temperature and humidity controlled heating, ventilation and air conditioning (HVAC) systems. The outside and recirculated air for these HVAC systems will include filters that mitigate environmental contaminants such as smoke and dust. These filtration systems must be specified and sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions. The area in which edible medical cannabis goods are stored also may not be exposed to direct sunlight.

## Odor Control – "Engineering Controls"

The project as proposed shall comply with the City of Santa Rosa's odor mitigation standards set forth in Zoning Code Chapter 20-46. The industry accepted method to remove cannabis odors for exhaust airstreams is carbon filtration. UMMA LLC will install activated carbon filter canisters or inline filters on their exhaust systems serving spaces at risk for emitting cannabis odors. UMMA LLC will also install activated carbon inline filters on their recirculating air systems serving spaces at risk for emitting cannabis odors. These carbon filters are designed for the control of VOC's, odors and other gaseous contaminants. The spaces at risk for emitting cannabis odors are noted on the odor-control floor plan provided by UMMA LLC; these spaces include the Lobby/Reception, Retail, Storage, Caged Locked Storage and Glass Enclosed space. The exhaust and recirculated air for these spaces will pass through an activated carbon filter, which uses chemical adsorption to remove organic compounds from the airstream. These organic compounds carrying the cannabis odor are captured through a process of adsorption in the microporous carbon. The activated carbon filtration systems must be sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions. Suitable activated carbon filters manufacturers include: Camfil, Can-Filters Canada, Purafil or approved equivalent by a Professional Engineer.

## Noise

HVAC equipment shall comply with the City of Santa Rosa's Chapter 17-16 (Noise) requirements. These HVAC systems must be specified and sized properly by a Professional Mechanical Engineer and maintained by the Owner per the manufacturer's instructions.

Sincerely,



TEP Engineering  
Andrew Souza, P.E., CPD, GPD, LEED AP BD+C





## **UMMA LLC**

### **INVENTORY CONTROL PROCEDURES**

#### **PURPOSE**

To develop procedures for UMMA LLC receipt of inventory, where and how the inventory and record of the inventory are stored and performing accurate inventory reconciliation.

#### **RECEIVING SHIPMENTS**

UMMA LLC employees shall make personal contact with any individual making a delivery and confirm that they are holders of the appropriate state cannabis license(s) by checking both the name and license number of the manufacturer or cultivator who provided the batch.

The UMMA LLC employee will either complete the process of storing the delivery properly or shall remain with the products delivered until that employee can officially hand the storage duties off to another designated UMMA LLC employee. At no time will the received delivery remain in an unlocked area without the presence of another employee.

#### **STORAGE**

Storage of cannabis delivered shall be in the Distribution Area at our UMMA LLC facility. UMMA LLC employees shall store all cannabis goods batches separately and distinctly from other cannabis goods batches on UMMA LLC premises.

UMMA LLC shall keep an INVENTORY LOG containing the following information for each batch:

- The name and license number of the manufacturer or cultivator who provided the batch;

- the date of entry into the distributor's storage area;
- the unique identifiers and batch number associated with the batch;
- a description of the cannabis goods with enough detail to easily identify the batch;
- the weight of or quantity of units in the batch;
- the best-by, sell-by, or expiration date of the batch, if any; and
- where on the premises the batch is kept.

Each storage area will be secured by a locking mechanism in a separated fenced-in area within the walls of our facility. Employees shall not store cannabis goods outdoors, or in employee break rooms, changing facilities, and/or bathrooms.

All manifests and other accompanying documentation are to be reviewed and 2 copies shall be made of each. Provide one copy to the Chief Compliance Officer and route the second copy to the General Manager for recordkeeping and reporting purposes. The Chief Compliance Officer shall be charged with keeping the documentation in a hard-copy file and the General Manager will be charged with inputting the transaction into the track-and-trace system. Either the Chief Compliance Officer, the General Manager, or a designated employee may fulfill the duties of the other as outlined above, without absolution of responsibility.

The General Manager will conduct an inventory reconciliation every 14 days to ensure that inventory records are accurate and provide a report at the first Owner's meeting of each month. In carrying out the reconciliation process, the General Manager will confer, if needed, with the Chief Compliance Officer and any other staff that were involved in the storage of cannabis storage at UMMA LLC.

If the Chief of Compliance Officer, the General Manager, or any other UMMA LLC employee finds a discrepancy between the inventory of stock and the inventory log or track and trace system that is outside of normal weight loss caused by moisture loss, the Chief Compliance Officer shall commence a full audit of the batch in which the discrepancy was found.

**In accordance to § 5029. Transition to Regulated Commercial Cannabis Market**

(a) Beginning January 1, 2018, UMMA LLC will not transport or sell any edible cannabis product that exceeds 10 milligrams of tetrahydrocannabinol (THC) per serving.

(b) Notwithstanding any other law, or regulation in this division, beginning January 1, 2018 and before July 1, 2018 licensees may do all of the following:

(1) UMMA LLC may conduct business with other licensees irrespective of the M or A designation on their licenses.

(2) Cannabis goods held in inventory by a retailer at the time of licensure that are not in child resistant packaging may be sold if they are placed into child-resistant packaging by the retailer at the time of sale.

(3) Non-edible cannabis products that do not meet the THC limits per package specified by the State Department of Public Health in regulation may be transported and sold.

(4) An M-license may transport or sell medicinal edible cannabis products that are 10 milligrams of THC or less per serving regardless of the THC amount in the package.

(5) Cannabis goods that do not meet the labeling requirements prescribed by the Act or the State Department of Public Health in regulation may be transported and sold if a sticker with the applicable warning statement under Business and Professions Code section 26120, subdivisions (c)(1)(A) and (c)(1)(B) is affixed to the cannabis goods prior to sale by the retailer.

**In accordance to § 5036. Notification of Theft, Loss, and Criminal Activity**

(a) UMMA LLC shall notify the Bureau and local law enforcement within 24 hours of discovery of any of the following situations:

(1) UMMA LLC discovers a significant discrepancy as defined in section 5034 of this division in its inventory.

(2) UMMA LLC becomes aware of or has reason to suspect diversion, theft, loss, or any other criminal activity pertaining to the operations of UMMA LLC.

(3) UMMA LLC becomes aware of or has reason to suspect diversion, theft, loss, or any other criminal activity by an agent or employee of the licensee pertaining to the operations of the licensee.

(4) The licensee becomes aware of or has reason to suspect the loss or unauthorized alteration of records related to cannabis goods, customers, or the licensee's employees or agents.

(5) The licensee becomes aware of or has reason to suspect any other breach of security.

(b) The notification to the Bureau pursuant to subsection (a) of this section shall be in writing and include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.

#### **In accordance with § 5037. Record Retention**

(a) UMMA LLC shall keep and maintain the following records related to commercial cannabis activity for at least seven years:

(1) Financial records including, but not limited to, bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration (formally Board of Equalization) under Title 18 California Code of Regulations sections 1698 and 4901.

(2) Personnel records, including each employee's full name, social security or individual tax payer identification number, date employment begins, and date of termination of employment if applicable.

(3) Training records, including but not limited to the content of the training provided, and the names of the employees that received the training.

(4) Contracts with other licensees regarding commercial cannabis activity.

(5) Permits, licenses, and other local authorizations to conduct UMMA LLC's commercial cannabis activities. Bureau of Cannabis Control Emergency Regulation Text Page 28 of 115 (6) Security records, except for surveillance recordings required pursuant to section 5044.

(7) Records relating to the composting or destruction of cannabis goods.

(8) Documentation for data or information entered into the track and trace system.

(9) All other documents prepared or executed by an owner of UMMA LLC or employees or assignees in connection with UMMA LLC.

(b) The Bureau may make any examination of the books and records of any licensee as it deems necessary to perform its duties under the Act.

(c) Records shall be kept in a manner that allows the records to be produced for the Bureau at UMMA LLC premises in either hard copy or electronic form, whichever the Bureau requests.

(d) UMMA LLC may contract with a third party to provide custodial or management services of the records. Such a contract shall not relieve UMMA LLC of the responsibilities under this section.

#### **In accordance with § 5048. Track and Trace System**

(a) UMMA LLC will create and maintain an active and functional account within the track and trace system prior to engaging in any commercial cannabis activity, including the purchase, sale, test, packaging, transfer, transport, return, destruction, or disposal, of any cannabis goods.

(b) UMMA LLC will designate one individual owner as the track and trace system account manager. The account manager may authorize additional owners or employees as track and trace system users and shall ensure that each user is trained on the track and trace system prior to its access or use.

(1) The account manager shall attend and successfully complete all required track and trace system training, including any orientation and continuing education.



(2) If the account manager did not complete the required track and trace system training prior to receiving their annual license, the account manager shall sign up for and complete state mandated training, as prescribed by the Bureau, within five business days of license issuance.

(d) The account manager and each user shall be assigned a unique log-on, consisting of a username and password. The account manager or each user accessing the track and trace system shall only do so under his or her assigned log-on, and shall not use or access a log-on of any other individual. No account manager or user shall share or transfer his or her log-on, username, or password, to be used by any other individual for any reason.

(e) The account manager shall maintain a complete, accurate, and up-to-date list of all track and trace system users, consisting of their full names and usernames.

(f) UMMA LLC will monitor all compliance notifications from the track and trace system, and timely resolve the issues detailed in the compliance notification.

(1) UMMA LLC will keep a record, independent of the track and trace system, of all compliance notifications received from the track and trace system, and how and when compliance was achieved.

(2) If UMMA LLC is unable to resolve a compliance notification within three business days of receiving the notification, UMMA LLC shall notify the Bureau immediately.

(g) UMMA LLC is accountable for all actions its owners or employees take while logged into or using the track and trace system, or otherwise while conducting track and trace activities.

#### **In accordance to § 5049. Track and Trace Reporting**

(a) UMMA LLC shall record in the track and trace system, all commercial cannabis activity, including any:

(1) Packaging of cannabis goods.

(2) Sale of cannabis goods.

(3) Transportation of cannabis goods to a licensee.

(4) Receipt of cannabis goods.

(5) Return of cannabis goods.

(6) Destruction and disposal of cannabis goods.

(7) Laboratory testing and results.

(8) Any other activity as required pursuant to this division, or by any other licensing authority.

(b) The following information shall be recorded for each activity entered in the track and trace system:

(1) Name and type of the cannabis goods.

(2) Unique identifier of the cannabis goods.

(3) Amount of the cannabis goods, by weight or count.

(4) Date and time of the activity or transaction.

(5) Name and license number of other licensees involved in the activity or transaction.

(6) If the cannabis goods are being transported: (A) The licensee shall transport pursuant to a shipping manifest generated through the track and trace system, that includes items (1) through (5) of this subsection, as well as: (i) The name, license number, and premises address of the originating licensee. (ii) The name, license number, and premises address of the licensee transporting the cannabis goods. (iii) The name, licensee number, and premises address of the destination licensee receiving the cannabis goods into inventory or storage. (iv) The date and time of departure from the licensed premises and approximate date and time of departure from each subsequent licensed premises, if any. (v) Arrival date and estimated time of arrival at each licensed premises. (vi) Driver's license number of the personnel transporting the cannabis goods, and the make, model, and license plate number of the vehicle used for transport. (B) Upon pick-up or receipt of cannabis goods for transport, storage, or inventory, UMMA LLC shall ensure that the cannabis goods received are as described in the shipping manifest, and shall record acceptance and acknowledgment of the cannabis goods in the track and trace system.

(C) If there are any discrepancies between the type or quantity specified in the shipping manifest and the type or quantity received by the licensee, UMMA LLC shall record and document the discrepancy in the track and trace system and in any relevant business record.

**In accordance with § 5050. Loss of Access**

(a) If at any point UMMA LLC loses access to the track and trace system for any reason, the licensee shall prepare and maintain comprehensive records detailing all commercial cannabis activities that were conducted during the loss of access.

(b) UMMA LLC shall both document and notify the Bureau immediately:

(1) When access to the system is lost; (2) When it is restored; and (3) The cause for the loss of access.

(c) Once access is restored, all commercial cannabis activity that occurred during the loss of access shall be entered into the track and trace system within three business days of access being restored.

(d) UMMA LLC will not transport, transfer or deliver any cannabis goods until such time as access is restored and all information recorded in the track and trace system.

**In accordance with § 5051. Track and Trace System Reconciliation**

(a) In addition to other inventory reconciliation requirements under this division, UMMA LLC shall reconcile the physical inventory of cannabis goods at the licensed premises with the records in the track and trace database at least once every 14 days.

(b) If UMMA LLC finds a discrepancy between its physical inventory and the track and trace system database, UMMA LLC will conduct an audit, and notify the Bureau of any reportable activity pursuant to section 5036.

**In accordance to § 5052. Temporary Licenses; Licensees in Operation at Time of Licensure**

- (a) UMMA LLC operating under a temporary license issued pursuant to section 5001 is not required to record commercial cannabis activity in the track and trace system as otherwise required by this article.
- (b) UMMA LLC shall track and record all cannabis commercial activities and information required pursuant to this division and any other provision of law, at a minimum, on paper receipts, invoices, or manifests.
- (c) Any commercial cannabis activity conducted between annual license holders shall be recorded in the track and trace system.
- (d) UMMA LLC in operation at the time the annual license is issued shall input all required inventory and other reportable information into the track and trace system no later than 30 days after the track and trace system account manager attends the training required pursuant to section 5048.

**In accordance to § 5055. Cannabis Waste Management**

- (a) UMM LLC may not sell cannabis waste.
- (b) UMMA LLC shall comply with all applicable waste management laws including, but not limited to, Division 30 of the Public Resources Code.
- (c) UMMA LLC shall dispose of cannabis waste in a secured waste receptacle or in a secured area on the licensed premises. For the purposes of this section, “secure waste receptacle” or “secured area” means that physical access to the receptacle or area is restricted to UMMA LLC and its employees and the local agency, local agency franchiser, or permitted private waste hauler. Public access to the designated receptacle or area is prohibited.
- (d) If UMMA LLC is composting cannabis waste on the licensed premises, UMMA LLC shall do so in compliance with Title 14 of the California Code of Regulations at Chapter 3.1 (commencing with Section 17850). (e) If a local agency, a local agency franchiser, or permitted private waste



hauler is being used to collect and process cannabis waste, UMMA LLC shall do all the following:

- (1) Provide the Bureau with the name of the entity hauling the waste;
- (2) Obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises; and
- (3) Obtain a copy of the certified weight ticket, or other documentation prepared by the entity hauling the waste confirming receipt of the cannabis waste at one, or more, of the following solid waste facilities: (A) A manned fully permitted solid waste landfill or transformation facility; (B) A manned fully permitted composting facility or manned composting operation; (C) A manned fully permitted in-vessel digestion facility or manned in-vessel digestion operation; (D) A manned fully permitted transfer/processing facility or manned transfer/processing Operation; or Bureau of Cannabis Control Emergency Regulation Text Page 38 of 115 (E) A manned fully permitted chip and grind operation.
- (f) If UMMA LLC is self-hauling cannabis waste to one, or more, of the solid waste facilities in subsection (e)(3) of this section, UMMA LLC shall obtain for each delivery of cannabis waste by UMMA LLC a copy of a certified weight ticket or receipt documenting delivery from the solid waste facility. Only UMMA LLC or its employees may transport self-hauled cannabis waste.

**In accordance with § 5309, Inventory Reconciliation UMMA LLC will maintain the following procedures:**

- (a) UMMA LLC shall reconcile all inventories of cannabis goods at least once every 14 days.
- (b) UMMA LLC shall keep an inventory log containing the following information for each batch:
  - (1) The manufacturer or cultivator's name and license number, who provided the batch;
  - (2) The date of entry into UMMA LLC's storage area;
  - (3) The unique identifiers and batch number associated with the batch;
  - (4) A description of the cannabis goods with enough detail to easily identify the batch;
  - (5) The weight of or quantity of units in the batch;

(6) The best-by, sell-by, or expiration date of the batch, if any; and Bureau of Cannabis Control  
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(7) Location on the premises of where the batch is kept;

(c) If a distributor finds a discrepancy between the inventory of stock and the inventory log or track and trace system that is outside of normal weight loss caused by moisture loss, the distributor shall commence a full audit of the batch in which the discrepancy was found.

#### **In accordance to § 5310. Records**

(a) In addition to the records required by section 5037 of this division, UMMA LLC will maintain the following records: (1) Records relating to branding, packaging and labeling; (2) Inventory logs and records; (3) Transportation bills of lading and shipping manifests for completed transports and for cannabis goods in transit; (4) Vehicle and trailer ownership records; (5) Quality-assurance records; (6) Records relating to destruction of cannabis goods; (7) Laboratory-testing records; (8) Warehouse receipts; (9) Records relating to tax payments collected and paid under Sections 34011 and 34012 of the Revenue and Tax Code.

#### **In accordance to § 5422. Receiving Shipments of Inventory**

(a) A retailer shall receive a shipment of cannabis goods only from a distributor.

(b) A retailer shall accept shipments of cannabis goods only between the hours of 6:00 a.m. Pacific Time to 10:00 p.m. Pacific Time.

(c) During business hours, shipments of cannabis goods shall not enter the premises through an entrance or exit that is available for use by the public.

#### **In accordance to § 5423. Inventory Documentation**

A retailer shall maintain an accurate record of its inventory. A retailer shall provide the Bureau with the record of inventory upon request. A retailer shall keep a record of the following information for all cannabis goods the retailer has in its inventory:

- (a) A description of each item in the retailer's inventory. This description will be such that the cannabis goods can easily be identified;
- (b) An accurate measurement of the quantity of the item;
- (c) The date and time the cannabis goods were received by the retailer;
- (d) The sell-by or expiration date on any cannabis goods, if any;
- (e) The name and license number of the licensee that delivered the cannabis goods to the retailer;
- (f) The name and license number of the distributor that provided the cannabis goods to the retailer; and
- (g) The price the retailer paid for the cannabis goods, including taxes, delivery costs, or any other costs.

**In accordance to § 5424. Inventory Reconciliation**

- (a) A retailer shall perform a reconciliation of its inventory at least once every 14 days.
- (b) A retailer shall verify that the retailer's physical inventory matches the retailer's records pertaining to inventory.
- (c) The result of inventory reconciliation shall be retained in the retailer's records and shall be made available to the Bureau upon request.
- (d) If a retailer identifies any evidence of theft, diversion, or loss, the retailer shall notify the Bureau and law enforcement pursuant to section 5036 of this division.
- (e) If a significant discrepancy as defined in section 5034 of this division is discovered between a retailer's physical inventory and the retailer's inventory records, the retailer shall notify the Bureau and law enforcement pursuant to section 5036 of this division.

## **UMMA LLC**

### **TRANSPORTATION PROCEDURES**

#### **PURPOSE**

To provide a procedure for our company regarding transporting goods under our State Distribution License. These procedures will pertain to both UMMA LLC transporting cannabis or cannabis products and, if and when, UMMA LLC contracts for transportation services.

#### **REQUIREMENTS FOR TRANSPORTING CANNABIS GOODS**

##### **In accordance with §5002, (A) The Transportation Procedures**

(i) A description of UMMA LLC's procedures for transportation of cannabis goods, including whether or not UMMA LLC will be transporting cannabis goods or contracting for transportation services. UMMA LLC will adhere to the following requirements during the transportation of cannabis goods:

Transportation of shall only be conducted from inside a vehicle or trailer and shall not be visible or identifiable from outside of the vehicle or trailer.

All Cannabis goods shall be locked in a box, container, or cage that is secured to the inside of the vehicle or trailer.

While left unattended, vehicles and trailers shall be locked and secured.

Employees shall not leave a vehicle or trailer containing cannabis goods unattended in a residential area or parked overnight in a residential area.

Each UMMA LLC transportation vehicle shall have a vehicle alarm system. While not required, company transportation vehicles may also add motion detectors, pressure switches, duress, panic, and/or hold-up alarms.

Packages or containers holding cannabis goods shall not be tampered with, or opened, during transport.

Employees transporting cannabis goods shall only travel between licensees shipping or receiving cannabis goods and our UMMA LLC facility when engaged in the transportation of cannabis goods. UMMA LLC shipments may include multiple shipments of cannabis goods at any time.

Employees transporting cannabis goods shall not deviate from the travel plan on the UMMA LLC Manifest Form, except for necessary rest, fuel, or vehicle repair stops.

UMMA LLC currently holds a Medicinal Distributor license. If and when UMMA LLC holds both an A-license and an M-license, medicinal and adult-use cannabis goods may only be transported in the same vehicle if the cannabis goods are clearly identified and marked as "A" for adult-use cannabis goods, or "M" for medicinal cannabis goods and placed in separate boxes in the vehicle. Marking products as "A" and "M" must occur on the physical packaging of the cannabis goods and on the shipping manifest.

UMMA LLC employees shall not transport any non-cannabis goods with cannabis goods. The only exception to that are for cannabis accessories that are defined as any equipment, products or materials of any kind which are used, intended for use, or designed for use in planting, propagating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packaging, repackaging, storing, smoking,



vaporizing, or containing marijuana, or for ingesting, inhaling, or otherwise introducing marijuana or marijuana products into the human body.

During transportation or on our UMMA LLC premises, employees shall allow our vehicles and trailers to be inspected by BCC or law enforcement officials whenever requested.

UMMA LLC employees may transport cannabis goods by foot, hand truck, fork lift, or other similar means, if it is operationally infeasible to transport cannabis goods inside of a vehicle or trailer because the licensed premises that the cannabis goods will be transported from and the licensed premises that will be receiving the cannabis goods are located within the same building or on the same parcel of land. A shipping manifest is still required when transporting cannabis goods by these methods.

**In accordance to § 5029. Transition to Regulated Commercial Cannabis Market**

(a) Beginning January 1, 2018, UMMA LLC will not transport or sell any edible cannabis product that exceeds 10 milligrams of tetrahydrocannabinol (THC) per serving.

(b) Notwithstanding any other law, or regulation in this division, beginning January 1, 2018 and before July 1, 2018 licensees may do all of the following:

(1) UMMA LLC may conduct business with other licensees irrespective of the M or A designation on their licenses.

(2) Cannabis goods held in inventory by a retailer at the time of licensure that are not in child resistant packaging may be sold if they are placed into child-resistant packaging by the retailer at the time of sale.

(3) Non-edible cannabis products that do not meet the THC limits per package specified by the State Department of Public Health in regulation may be transported and sold.

(4) An M-license may transport or sell medicinal edible cannabis products that are 10 milligrams of THC or less per serving regardless of the THC amount in the package.

(5) Cannabis goods that do not meet the labeling requirements prescribed by the Act or the State Department of Public Health in regulation may be transported and sold if a sticker with the applicable warning statement under Business and Professions Code section 26120, subdivisions (c)(1)(A) and (c)(1)(B) is affixed to the cannabis goods prior to sale by the retailer.

**In accordance with § 5050. Loss of Access**

(a) If at any point UMMA LLC loses access to the track and trace system for any reason, the licensee shall prepare and maintain comprehensive records detailing all commercial cannabis activities that were conducted during the loss of access.

(b) UMMA LLC shall both document and notify the Bureau immediately:

(1) When access to the system is lost; (2) When it is restored; and (3) The cause for the loss of access.

(c) Once access is restored, all commercial cannabis activity that occurred during the loss of access shall be entered into the track and trace system within three business days of access being restored.

(d) UMMA LLC will not transport, transfer or deliver any cannabis goods until such time as access is restored and all information recorded in the track and trace system.

**In accordance to § 5055. Cannabis Waste Management**

(a) UMM LLC may not sell cannabis waste.

(b) UMMA LLC shall comply with all applicable waste management laws including, but not limited to, Division 30 of the Public Resources Code.

(c) UMMA LLC shall dispose of cannabis waste in a secured waste receptacle or in a secured area on the licensed premises. For the purposes of this section, “secure waste receptacle” or “secured area” means that physical access to the receptacle or area is restricted to UMMA LLC

and its employees and the local agency, local agency franchiser, or permitted private waste hauler. Public access to the designated receptacle or area is prohibited.

(d) If UMMA LLC is composting cannabis waste on the licensed premises, UMMA LLC shall do so in compliance with Title 14 of the California Code of Regulations at Chapter 3.1 (commencing with Section 17850).

(e) If a local agency, a local agency franchiser, or permitted private waste hauler is being used to collect and process cannabis waste, UMMA LLC shall do all the following:

(1) Provide the Bureau with the name of the entity hauling the waste;

(2) Obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises; and

(3) Obtain a copy of the certified weight ticket, or other documentation prepared by the entity hauling the waste confirming receipt of the cannabis waste at one, or more, of the following solid waste facilities:

(A) A manned fully permitted solid waste landfill or transformation facility;

(B) A manned fully permitted composting facility or manned composting operation; (C) A manned fully permitted in-vessel digestion facility or manned in-vessel digestion operation;

(D) A manned fully permitted transfer/processing facility or manned transfer/processing Operation; or Bureau of Cannabis Control Emergency Regulation Text Page 38 of 115

(E) A manned fully permitted chip and grind operation.

(f) If UMMA LLC is self-hauling cannabis waste to one, or more, of the solid waste facilities in subsection (e)(3) of this section, UMMA LLC shall obtain for each delivery of cannabis waste by UMMA LLC a copy of a certified weight ticket or receipt documenting delivery from the solid waste facility. Only UMMA LLC or its employees may transport self-hauled cannabis waste.

## **REQUIRED TRANSPORT VEHICLE INFORMATION**

**In accordance with § 5311. UMMA LLC shall follow the Requirements for the Transportation of Cannabis Goods.**

The following requirements apply when transporting cannabis goods between licensees or licensed premises:

- (a) Transportation shall only be conducted by persons holding a distributor license under the Act, or employees of those persons.
- (b) All vehicles transporting cannabis goods for hire shall be required to have a motor carrier permit pursuant to Chapter 2 (commencing with Section 34620) of Division 14.85 of the Vehicle Code.
- (c) Transportation by means of aircraft, watercraft, drone, rail, human powered vehicle, and unmanned vehicle is prohibited.
- (d) Cannabis goods shall only be transported inside of a vehicle or trailer and shall not be visible or identifiable from outside of the vehicle or trailer.
- (e) Cannabis goods shall be locked in a box, container, or cage that is secured to the inside of the vehicle or trailer.
- (f) While left unattended, vehicles and trailers shall be locked and secured.
- (g) A distributor shall not leave a vehicle or trailer containing cannabis goods unattended in a residential area or parked overnight in a residential area.
- (h) At a minimum, a distributor shall have a vehicle alarm system on all transport vehicles and trailers. Motion detectors, pressure switches, duress, panic, and hold-up alarms may also be used.
- (i) Packages or containers holding cannabis goods shall not be tampered with, or opened, during transport.
- (j) A distributor transporting cannabis goods shall only travel between licensees shipping or receiving cannabis goods and its own licensed premises when engaged in the transportation of cannabis goods. The distributor may transport multiple shipments of cannabis goods at once in accordance with applicable laws.
- (k) When a distributor holds both an A-license and an M-license, medicinal and adult-use cannabis goods may be transported in the same vehicle only if the cannabis goods are clearly identified and marked as "A" for adult-use cannabis goods, or "M" for medicinal cannabis goods

both on the physical packaging of the cannabis goods and on the shipping manifest. While in transport, the medicinal and adult-use cannabis goods shall be secured and separated from each other in the vehicle. In no circumstances may non-cannabis goods be transported with cannabis goods.

(l) Vehicles and trailers transporting cannabis goods are subject to inspection by the Bureau at any licensed premises or during transport at any time.

**In accordance to § 5312. UMMA LLC shall follow the Required Transport Vehicle Information**

(a) In addition to the information required in section 5314 of this division, any distributor who will be or is transporting cannabis goods shall provide the following information to the Bureau:

(1) Proof of ownership or a valid lease for any and all vehicles and trailers that will be used to transport cannabis goods;

(2) The year, make, model, license plate number, and numerical Vehicle Identification Number (VIN) for any and all vehicles and trailers that will be used to transport cannabis goods; and

(3) Proof of insurance for each vehicle and trailer used to transport cannabis goods. Bureau of Cannabis Control Emergency Regulation Text Page 44 of 115

(b) UMMA LLC shall provide the Bureau with the information required by this section in writing for any new vehicle or trailer that will be used to transport cannabis goods prior to using the vehicle or trailer to transport cannabis goods.

UMMA LLC will submit the year, make, model, license plate number, numerical Vehicle Identification Number and Proof of Insurance once vehicle has been acquired and distinguished. Currently no vehicle has been acquired or distinguished.

(c) UMMA LLC shall provide the Bureau with any changes to the information required by this section in writing within 30 calendar days.

**LIMITATIONS ON VEHICLE OCCUPANTS**



**In accordance § 5313. Transport Personnel Requirements**

(a) No person under the age of 21 years old shall be in a UMMA LLC commercial vehicle while transporting cannabis goods.

(b) Only people allowed to be in a UMMA LLC vehicle while transporting cannabis goods are UMMA LLC licensee, employees of the distributor while transporting cannabis goods.

**SHIPPING MANIFEST**

**In accordance to § 5314. Shipping Manifest**

(a) Prior to transporting cannabis goods, UMMA LLC shall generate a shipping manifest through the track and trace system for the following activities:

- (1) Testing and sampling;
- (2) Sale of cannabis goods to a licensee;
- (3) Destruction or disposal of cannabis goods; and
- (4) Any other activity, as required pursuant to this division, or by any other licensing authority.

(b) The distributor shall securely transmit the manifest pursuant to subsection(a) of this section, to the Bureau and the licensee that will receive the cannabis goods prior to transporting the cannabis goods. (c) The distributor shall ensure and verify that the cannabis goods being taken into possession for transport at the originating licensed premises are as described and accurately reflected in the shipping manifest.

(1) UMMA LLC shall not take into possession or transport:

- (A) Any cannabis goods that are not on the shipping manifest; or
- (B) Any cannabis goods that are less than or greater than the amount reflected on the shipping manifest.

(2) UMMA LLC is responsible for any discrepancies between the shipping manifest and the cannabis goods in its possession during transport, and subject to any enforcement or disciplinary action related to such discrepancy.

(3) UMMA LLC shall not void or change a shipping manifest during transport, or after departing from the originating licensed premises.

(d) A shipping manifest shall accompany every transport of cannabis goods.

(e) Notwithstanding subsection (a) of this section, if a transporting distributor has not obtained access to the track and trace system, the distributor shall complete the shipping manifest outside of the track and trace system and transmit it to the Bureau and the licensee receiving the shipment by electronic mail.

(f) If the transporting distributor has access to the track and trace system and the licensee receiving the shipment has not obtained access to the track and trace system, the distributor shall complete the shipping manifest in the track and trace system and transmit it to the Bureau. However, the distributor shall send a copy to the licensee receiving the shipment by electronic mail.

UMMA LLC will be using a third party tracking platform called GrowFlow in order to be fully prepared for the State's launch of the Track-and-Trace system. GrowFlow has already integrated with Metrc, the state issued track-and-trace system. Metrc Integration Specialist Claire Feetham of GrowFlow is assigned to UMMA LLC. Claire Feetham's can be reached at [claire@getgrowflow.com](mailto:claire@getgrowflow.com) or (206) 494-4689 ext. 703.

UMMA LLC has assigned two separate platforms through GrowFlow – one for our Distribution License and one for our Cultivation License.

# **UMMA LLC**

## **NON-LABORATORY QUALITY CONTROL PROCEDURES**

### **PURPOSE**

To develop and adhere to standard procedures for preventing the deterioration of cannabis goods held by UMMA LLC.

### **STORAGE**

UMMA LLC employees shall store all cannabis goods batches separately and distinctly from other cannabis goods batches on UMMA LLCs' premises.

UMMA LLC shall ensure that a label with the following information is physically attached to each container of each batch:

The name and license number of the manufacturer or cultivator who provided the batch;

- The date of entry into the distributor's storage area;
- the unique identifiers and batch number associated with the batch;
- a description of the cannabis goods with enough detail to easily identify the batch;
- the weight of or quantity of units in the batch; and
- the best-by, sell-by, or expiration date of the batch, if any.

### **PACKAGING and LABELING**

UMMA LLC procedures for ensuring that cannabis goods are properly packaged and labeled prior to retail sale are as follows:

UMMA LLC may package, re-package, label, and re-label cannabis for retail sale;

UMMA LLC shall not package, re-package, label, or re-label manufactured cannabis products except when UMMA LLC also holds a manufacturing license and

is packaging, re-packaging, labeling, or re-labeling its own manufactured cannabis products.

If it is determined during laboratory testing that a manufactured product is labeled with the incorrect amount of THC per package or serving but is within the THC limits for sale, UMMA LLC may re-label the package with the accurate THC amount and with the accurate amount of cannabinoids and terpenoids if laboratory testing determines that the manufactured product is labeled with incorrect amounts.

### **PROTOCOL FOR LABORATORY TESTING ACTIVITIES AT SWEETWATER PHARMS**

The following protocols shall be followed to ensure that a licensed testing laboratory samples and analyzes cannabis goods held by UMMA LLC for quality control purposes.

- After taking physical possession of a cannabis goods batch, UMMA LLC shall contact a testing laboratory and arrange for a laboratory employee to come to our premises to select a representative sample for laboratory testing.
- UMMA LLC shall ensure that the batch size from which the sample is taken meets the requirements of this division.
- A UMMA LLC employee shall be physically present to observe the laboratory employee obtain the sample of cannabis goods for testing and shall ensure that the increments are taken from throughout the batch.
- The sampling shall be video recorded with the batch number stated at the beginning of the video and a visible time and date indication on the video recording footage. The video recordings shall be maintained for 180 days.
- After the sample has been selected, both the UMMA LLC employee and the laboratory employee shall sign and date the chain of custody, attesting to the sample selection having occurred.
- UMMA LLC employees shall not assist the laboratory employee nor touch the cannabis goods or the sampling equipment while the laboratory employee is obtaining the sample.

