

Updated Project Description
The Bjork Group DBA Sonoma Gardens
Brian Bjork

City of Santa Rosa

JUN 21 2018

Planning & Economic
Development Department

June 20, 2018

Required Application Materials – Project Description Narrative (Updated)

a. Commercial Cannabis Use

The Bjork Group d/b/a Sonoma Gardens, the “Applicant”, proposes to occupy an existing industrial building located at 2704 Armory Drive. Applicant seeks to obtain a Conditional Use Permit for a medicinal and adult use Cannabis Retail Storefront.

The City of Santa Rosa’s Comprehensive Cannabis Ordinance, passed December 19, 2017 and effective January 19, 2018, provides for comprehensive regulation of both medical and adult use cannabis activities. This comprehensive ordinance allows for the permitting of commercial cannabis retail storefront uses in the Office Commercial (CO), Neighborhood Commercial (CN), General Commercial (CG), Community Shopping Center (CSC), Business Park (BP), Light Industrial (IL), and General Industrial (IG) zones (*See: Table 2-10 Allowed Land Uses and Permit Requirements for Industrial Districts*). The subject parcel is zoned General Commercial (CG). Applicant proposes a Cannabis Retail Storefront.

b. Compliance

State Licensing Requirements

Applicant recognizes that in order to obtain a State Commercial Cannabis License, Applicant must first obtain local authorization (*California Business and Professions Code Section 26050.1 (a)(2) and Bureau of Cannabis Control Regulations Sections 5001 and 5002*). Accordingly, Applicant has not yet applied for either a Temporary State License or an Annual State License from the Bureau of Cannabis Control, which is the department that issues licenses for retailers, as well as cannabis distributors, microbusinesses, testing labs, and cannabis events. Applicant will apply for a State License after receipt of a Conditional Use Permit, or other local authorization, from the City of Santa Rosa.

Applicant further recognizes that under California Business and Professions Code Section 26050 (b), all licenses will “bear a clear designation indicating whether the license is for commercial adult-use cannabis activity as distinct from commercial medicinal cannabis activity by prominently affixing an “A” or “M,” respectively.” However, licensees may hold both an A-license and an M-license for the same commercial cannabis activity; therefore, Applicant proposes to conduct both medicinal and adult-use commercial cannabis retail activity.

Applicant is aware of and prepared to comply with all Annual State License Application requirements, as outlined in Section 5002 of the Bureau of Cannabis Control Regulations. Such requirements include providing the State with: (i) Business information (including business formation documents, DBAs, funds and a list of all individuals who hold a financial interest in the business, a list of all owners of the business and their contact information, etc.); (ii) Conviction information, if applicable (including a detailed description of each conviction, date of conviction, dates of incarceration, dates of probation or parole, description of the offense, and statements of rehabilitation for each conviction); (iii) A description of any suspension or revocation of a commercial cannabis license, or sanctions for unlicensed commercial cannabis activity; (iv) A premises diagram; (v) Proof of local authorization from Santa Rosa; and (vi) A detailed description of transportation procedures, inventory procedures, quality control procedures, and security procedures.

Applicant further recognizes that the Bureau of Cannabis Control Regulations Section 5007 requires landowner approval to operate a commercial cannabis business; therefore, Applicant will provide the State with the lease agreement between itself and the property owner, as well as a signed statement from the property owner that states that the Applicant has the right to occupy the property and to use it as both an adult use and medicinal cannabis retail facility. Applicant understands that the State may request additional information and documents from the Applicant and Applicant will provide the information and documents within the allotted time period, in accordance with Bureau of Cannabis Control Regulations Section 5011.

Applicant recognizes that its Annual State License must be renewed each year and that applicable license fees must be paid each year prior to issuance of a renewed license by the State (*Bureau of Cannabis Control Regulations Section 5020*). Applicant will timely renew its Annual State License, as well as its Local Permit, to ensure that at all times, Applicant is operating its cannabis retail facility in compliance with both State and Local laws and regulations.

State Operational Standards

Applicant will ensure it is consistently compliant with all state operational requirements. These state operational requirements include, but are not limited to the following: (i) ensuring only individuals who are at least 21 years of age (with valid proof of identification) or who are 18 years of age (with valid proof of identification) and with a valid physician's recommendation are allowed to access the retail space or arrange for a delivery; (ii) maintaining limited access areas where only authorized employees, distributors, etc. are allowed to enter; (iii) never operating its retail business outside of the hours of 6:00 A.M. to 10:00 P.M.; (iv) never displaying cannabis goods in a place where they are visible from outside the licensed premises; (v) only receiving cannabis goods from a licensed distributor; (vi) verifying that no products have exceeded their expiration or sell-by date (if provided); (vii) never selling alcohol or tobacco (or any alcohol or tobacco products) at the licensed retail premises; (viii) ensuring it does not sell more than the applicable daily limits of cannabis and cannabis products to each individual; (ix) never reselling any cannabis goods that have been returned; (x) never providing free cannabis goods to any person, unless to a medicinal cannabis patient in compliance with Section 5411 of the BCC Regulations; (xi) recording all inventory and transactions into the track and trace system; (xii) never accepting any cannabis goods from a distributor that are not packaged as they will be sold at final sale; (xiii) always placing cannabis goods purchased by a customer into an opaque exit package before leaving the retail premises; (xiv) only delivering to privately-owned physical addresses through the use of an enclosed motor vehicle; (xv) always preparing a delivery request receipt for each delivery; (xvi) ensuring delivery drivers do not deviate from their designated delivery routes; (xvii) maintaining an accurate record of inventory at all times; (xviii) maintaining an accurate record for every sale made to a customer; and (xix) maintaining all retailer-specific records in accordance with Section 5037 of the BCC Regulations. Applicant will consistently review the Bureau of Cannabis Control's Regulations to ensure that Applicant is operating in compliance with state laws and regulations at all times.

Locational requirements are discussed under "Location Requirement & Setbacks" on page 7 below.

c. Separation of License Types

The Bjork Group d/b/a Sonoma Gardens, the Applicant, proposes to occupy 2074 Armory Dr. and to operate a Cannabis Retail Storefront where Applicant will conduct both medicinal and adult use commercial cannabis retail activity. Applicant will not conduct retail delivery. Applicant does not propose any other license type at the premises.

d. Building and Fire Codes

Declaration: In accordance with Section 20-46.050(E) of the Santa Rosa Cannabis Ordinance, Applicant will obtain all necessary building permits, fire permits, and CUPA permits, as necessary for the project and the facility, and will provide a Fire Department lock box for keys to gates and doors.

Signed: _____

Brian Bjork

Date: 06/20/2018

Description of Compliance with Building and Fire Codes: Applicant is inhabiting an existing commercial building that was previously granted a Conditional Use Permit to operate as The Cheshire Club, a retail boutique for display and sale of personal nicotine vaporizer devices and associated products. There was no expansion of the building or grading. Applicant's proposal is similar to this previous use in that Applicant proposes no expansion to the building nor any grading.

Applicant recognizes that a Building Permit is required to verify occupancy for this cannabis facility, and that solely obtaining a Conditional Use Permit does not authorize the Applicant to begin to operate its business within this facility. Applicant will submit all construction plans, calculations, and related documentation supporting the Building Permit application to the City in order to begin the process of obtaining a Building Permit and a Certificate of Occupancy after

Applicant has obtained discretionary approval in the form of a Conditional Use Permit. Applicant will ensure that all Building Permit design and supporting documentation is prepared by qualified design professionals licensed and registered by the State of California and that all construction and related work is performed by contractors licensed by the State of California for the specific discipline of work to be performed. Moreover, all design and construction will be consistent with the provision of the Santa Rosa City Code and the current edition of the California Building and Fire Codes.

Applicant will install and maintain all required improvements to ensure compliance with the Fire Code. Applicant is committed to installing proper electrical wiring and components for all electrical fixtures within the facility. Applicant understands that all construction or work for which a permit is required is subject to inspection by the Building Division and/or the Fire Department and that such construction or work must remain accessible and exposed for inspection purposes until approved. Applicant will ensure all City approved plans, specifications, and related documents are kept on the premises for City inspection staff. Applicant will not use or occupy the Subject Property until the Building Official has issued a Certificate of Occupancy.

BUILDING AND FIRE CODE STATEMENT

THIS PROJECT WILL COMPLY WITH ALL APPLICABLE BUILDING AND FIRE CODES. THE CANNABIS OPERATOR WILL OBTAIN ALL NECESSARY BUILDING PERMITS, FIRE PERMITS, AND CUPA PERMITS, AND PROVIDE A FIRE DEPARTMENT LOCK BOX FOR KEYS TO GATES AND DOORS PER SECTION 20-46.050.

PROPERTY ADDRESS:	2074 ARMORY DRIVE Santa Rosa, CA 95404
SCOPE OF WORK:	NON-STRUCTURAL TENANT IMPROVEMENT
APPLICABLE CODES:	2016 CBC T24 & ALL APPLICABLE LOCAL AND MUNICIPAL CODE REQUIREMENTS
REQUIRED PERMITS:	CITY OF SANTA ROSA BUILDING PERMIT CONDITIONAL USE PERMIT
PROPOSED USE:	RETAIL CANNABIS DISPENSARY
PROPOSED CONSTRUCTION TYPE:	TYPE VB
ZONING DISTRICT:	CG
OCCUPANCY:	M: MERCANTILE **

** THE EXISTING BUILDING DOES NOT HAVE A FIRE SPRINKLER SYSTEM. FIRE SPRINKLERS NOT REQUIRED PER CBC 903.2.7, AS NONE OF THE APPLICABLE CONDITIONS APPLY TO THIS SPACE.

Building and Fire Code Statement on Updated Site Plans

Applicant also recognizes that many State and local codes regulate cannabis facilities (aside from MAUCRSA, the State Regulations, and the City Ordinance). These many codes include, but are not limited to, the California Building Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Existing Building Code, California Green Building Standards Code, California Health and Safety Code, California Business and Professions Code, National Fire Protection Association Standards, and the Santa Rosa City Code. As Applicant moves into the Building Permit phase after it obtains a CUP for its retail cannabis facility, Applicant will consult with trained, licensed architects, designers, contractors, and other professionals to ensure that all building plans and subsequent construction is in compliance with all applicable codes, including provisions relating to: accessibility and accessible paths of travel; fire-resistance, fire alarm systems, smoke detectors, fire extinguishers, and exit paths; ventilation and exhaust systems; electrical systems; plumbing fixtures, fittings, and systems; lighting controls and energy consumption; and CalGreen Code requirements; among others.

As stated above, Applicant understands that it may be required to have a key box installed in a location approved by the Fire Department in the event that the Fire Code Official determines that access to or within a structure or area is restricted because of secured openings, or that immediate access may be necessary for live-saving or fire-fighting purposes. In this event, Applicant will promptly install and maintain a box of an approved type that will contain keys to gain necessary access, as required by the Fire Code Official and the California Fire Code.

As reiterated throughout this section, Applicant is committed to complying with all provisions of the Fire Code. Accordingly, Applicant will ensure all fire protection equipment, including fire extinguishers and fire alarm systems, are maintained in working order and serviced at regular intervals. Applicant will maintain clear access to all such fire protection equipment and will ensure that proper exit widths are appropriate and clear in the event of an emergency. Furthermore, Applicant will ensure that all illuminated "exit" signs are working at all times.

According to the CalEPA website, "Californians are protected from hazardous waste and hazardous materials by a Unified Program that ensures consistency throughout the state in regard to administrative requirements, permits, inspections, and enforcement. CalEPA oversees the statewide implementation of the Unified Program and its 81

certified local government agencies, known as Certified Unified Program Agencies (CUPAs), which apply regulatory standards established by five different state agencies. Effective January 1, 2009, all regulated businesses and local government Unified Program Agencies (UPAs) are required to submit Unified Program information electronically, either to the local regulatory agency or to the California Environmental Reporting System (CERS). CERS supports electronic data exchange among businesses, local governments and U.S. EPA.”² Applicant does not propose to keep any hazardous waste or hazardous materials on-site but will ensure that any potentially flammable items or materials are kept out of the Utility room and stored securely at all times.

e. Security Plan

Please see the previously submitted Confidential Security Plan for details on the security equipment and protocols for the premises.

f. Odor Mitigation Plan

As required by Section 20-46.050(H) of the City Ordinance, Applicant will have a comprehensive odor mitigation plan. Applicant recognizes that the City requires this odor mitigation plan to be certified by a licensed professional engineer to ensure that all mitigation controls are sufficient to effectively mitigate odors from all odor sources (City Ordinance Section 20-46.050(H)). Applicant contracted with TEP Engineering to ensure that its odor mitigation controls are sufficient to effectively mitigate odors from all odor sources. Please see the attached certified letter from Andy Souza of TEP Engineering.

Odor mitigation will be accomplished through the use of carbon filtration throughout the facility, to ensure no cannabis odors escape the facility. Odor mitigation systems will be operational at all times cannabis is present within the facility. All fans and filters will be sized to exchange air approximately ten (10) times per hour.

*Example of 10-inch
Max-Fan with Carbon
Filter and Speed Controller*



*Can-Fan
Can-Fan Max-Fan Inline Mixed Flow Fan, 14-Inch 1700
Cubic Feet Per Minute*



- Up to 1,700 rpm
- Max watts - 253
- 14-inch duct diameter

A carbon filter is a round, hollow device with a membrane that contains activated charcoal (carbon). “Dirty” air passes through the carbon filter and clean, odorless air exits the other side. Carbon filters are the most popular odor control option on the market because they are highly effective, widely available, and low maintenance. Granular Activated Carbon charcoal is so effective because of its high degree of micro-porosity. Carbon filters are low maintenance and with a proper pre-filter, Applicant will only have to change the activated carbon every 12 to 18 months, although this can vary based on variables such as fan speed, hours of use, carbon quality, etc. As stated above, the carbon filters utilized on-site will filter the air in the facility approximately ten (10) times per hour. This will reduce irritants for employees, customers, and neighbors of the facility. Fans will create air circulation to avoid stagnant areas where odors can collect. Applicant’s air filtration system will be properly maintained in accordance with industry standards to ensure appropriate air quality.

² <https://calepa.ca.gov/cupa/>

g. Outdoor Lighting

Notable goals of the Open Space and Conservation section of the Santa Rosa General Plan are to (1) to “reduce energy use in existing and new commercial, industrial, and public structures,” and (2) to “identify opportunities for decreasing energy use through installation of energy efficient lighting, reduced thermostat settings, and elimination of unnecessary lighting in public facilities.” In accordance with this goal, all exterior lighting at Applicant’s facility will be limited to a maximum height of 14 feet, will use energy efficient LED fixtures and lamps, and will not include lighting that will blink, flash, or be of unusually high intensity or brightness. In the parking area of Applicant’s facility, Applicant will remove the existing flood light and will install an LED area light and a 13-watt LED globe fixture, along with a laser cut corten sign with a lighted panel behind. (*See attached Site Plans*).

At Applicant’s facility, all exterior lighting systems will 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, in accordance with Section 20-46.050(I) of the City’s Ordinance. Applicant will have lights installed at various locations on the exterior of the building, some of which will be motion sensor lighting. Exterior lighting will 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 will be Building Code compliant and will comply with Section 20-30.080 of the City of Santa Rosa Municipal Code. Interior light systems will be fully shielded, including adequate coverings on windows, to confine light and glare to the interior of the structure.

h. Noise

Applicant recognizes that according to the Santa Rosa City Code (Chapter 17-16) it is unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, or unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. Accordingly, Applicant will ensure all noise from Applicant’s facility complies with the provisions of Chapter 17-16, including by: (i) ensuring the operation of machinery, equipment, pumps, fans, air-conditioning apparatus, or similar mechanical devices do not cause the noise level at the property line that exceeds the ambient base noise level by more than five decibels; (ii) not operating or allowing employees to operate a pandemoniac motor vehicle or operating a motor vehicle in any way that a reasonable person of normal hearing sensitivity is caused discomfort or annoyance; and (iii) not utilizing any sound-amplifying equipment.

i. Accessory Uses

Accessory Uses by Zoning

Applicant will operate a medical and recreational storefront dispensary. Applicant will not conduct any other accessory use permitted under the city’s commercial zoning code.

Accessory Uses by Room

Applicant will have Limited-Access Areas where only authorized individuals (such as employees, vendors, contractors, or other people with a business-purpose) will be permitted. An individual in the limited-access area who is not employed by Applicant (such as a vendor or distributor) will be escorted by Applicant or one of Applicant’s employees at all times while within the limited-access area (Bureau of Cannabis Control Regulations Sections 5042 and 5401). In accordance with Section 5401, any individual within the limited-access area will be at least 21 years old. Applicant will maintain a log of all authorized individuals who are not employees of the Applicant that enter the limited-access area. The logs will be made available to the Bureau of Cannabis Control upon request. Applicant will not receive consideration or compensation for permitting an individual to enter the limited-access area.

Restroom: No other use.

Utility Room: No other use.

Inventory Room: Uses that may be considered accessory uses within the Inventory room are (i) Securely storing cannabis in safes; (ii) Housing internet servers; (iii) Housing computer(s) dedicated to administrative uses; (iv) Storing monetary instruments such as cash and checks; (v) Warehousing locked cabinets that contain Financial records including, but not limited to bank statements, sales invoices, receipts, tax records, and all records required by the CA Department of Tax and Fee Administration under Title 18 of the California Code of Regulations sections 1698 and 4901; (vi) Storing 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; (vii) Storing training records, including, but not limited to, the content of the training provided, and the names of the employees that received the training; (viii) Storing contracts with other licensees regarding commercial cannabis activity; (ix) Storing copies of permits, licenses, and other local and state authorizations to conduct the licensee's commercial cannabis activity; (x) Storing security records; (xi) Storing records relating to waste management or destruction of cannabis goods; (xii) Storing documentation for data or information entered into the track and trace system; (xiii) Warehousing non-Cannabis related stationary, supplies, and materials; and (xiv) Meetings with employees, vendors, contractors, or other people with a business-purpose.

j. Other/Miscellaneous

Parking Analysis

One of the Goals and Policies of the Land Use and Livability section of Santa Rosa's General Plan is to "provide a range of commercial service 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." The site was previously used as another retail store, The Cheshire Club Vapor Boutique. In accordance with the General Plan, Applicant will have ample parking at the Subject Property.

Use	Parking Required	Total Square Footage	Parking Spaces Required
Retail	1 vehicle parking space per 250 sf; 1 bicycle space per 5,000 sf	1,700	Vehicle: 7 Bicycle: 1
Total Parking Spaces Required			Vehicle: 7 Bicycle: 1

The parking area at the Subject Property has ten (10) parking spaces, including one (1) ADA-compliant parking space. There are also five (5) additional street parking spaces along Armory Drive in front of the building. An ADA-accessible path of travel begins at the public sidewalk on Armory Drive, and continues through the parking lot, to the front doors of both units on the Subject Property (*see attached Site Plans*).

Applicant understands that one of the Guiding Principles of the City of Santa Rosa's General Plan is to "Reduce dependence on the automobile by improving pedestrian, bicycle, and transit alternatives and by locating essential commercial services in proximity to housing." In furtherance of reducing dependence on the automobile while also attracting a regional clientele, and in accordance with the City of Santa Rosa's Design Guidelines for parking, bicycle parking will be provided at Applicant's facility (*see attached Site Plans*).

Hours of Operation

Applicant's retail facility will be open to the public between 9:00 A.M. and 9:00 P.M. daily. Applicant's employees will work varying shifts between the hours of 8:00 A.M. and 10:00 P.M.; however, Applicant's security personnel will cover shifts to ensure that the Subject Property has security on-site 24 hours per day. Applicant will limit all commercial deliveries to the hours of 9:00 A.M. to 5:00 P.M. Monday through Friday.

When the retail premises is not open for retail sales, Applicant will ensure (i) the premises is securely locked with commercial-grade, non-residential door locks; (ii) the premises is equipped with an active alarm system which will be activated when the Applicant or Applicant's employees are not on the premises; and (iii) only employees and contractors of the Applicant are allowed to enter the premises (*Bureau of Cannabis Control Regulations Section 5403*). All security protocols and technologies will be utilized at all times the premises is not open to the public. (*See previously submitted Confidential Security Plan for further detail on Applicant's security procedures.*)

Special Events

Applicant does not propose to hold any special events on-site. If applicant does decide to hold a special event at the retail location in the future, Applicant will consult with the City and the State to ensure it acquires all necessary permits, licenses, and approvals prior to holding a special event.

Cannabis Use Application – Retail Use Requirements (Updated)

a. Location Requirement & Setbacks

California Business and Professions Code section 26054(b) provides that cannabis businesses cannot be located within a 600-foot radius of a school, youth center or day care center. However, this section further provides that "a licensing authority or a local jurisdiction may specify a different radius." The City of Santa Rosa's Comprehensive Cannabis Ordinance states that the 600-foot setback applies only to retail operations, and the City properly asserts its right to establish its own setbacks pursuant to California Business and Professions Code Section 26054(b). (*City Ordinance Section 26-46-040(B)*).

The City's Ordinance (as amended and adopted December 19, 2017), states that Cannabis Retail businesses must be 600 feet from a "school" as defined by the Health and Safety Code Section 11362.768 (City Ordinance Section 20-46.080(D)(2)). Health and Safety Code Section 11362.768 (h) defines a school as "any public or private school providing instruction in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes." Additionally, the City's Ordinance states that "a Cannabis Retail use will not be established within 600 feet of any other Cannabis Retail use established within and permitted by the City of Santa Rosa". (*City Ordinance Section 20-46.080(D)(2)*).

Currently no schools or other cannabis retail establishments, are within 600 feet of the Subject Property (*see attached Vicinity Map Denoting Closest Schools*). The Subject Property is in the Santa Rosa City School District. Based on the City of Santa Rosa's Public GIS map, the nearest school is Steele Lane Elementary, at a distance of approximately 1,463 feet from the parcel line of the Subject Property. The Subject Property therefore meets both State of California and City of Santa Rosa requirements for setback from schools.

b. Medicinal/Adult Use

The Bjork Group d/b/a Sonoma Gardens, the Applicant, proposes to occupy 2074 Armory Dr. and to operate a Cannabis Retail Storefront where Applicant will conduct both medicinal and adult use commercial cannabis retail activity. Applicant does not propose to conduct retail delivery. Applicant does not propose any other license type at the premises. Applicant seeks to obtain a Conditional Use Permit for the Cannabis Retail Storefront. The necessary application documents were previously submitted.

c. Operational Plan

i. Maintain an Employee Register

Applicant's employee register will include all important information about employees, including, but not limited to, their names, addresses, telephone numbers, job titles, training records, and shift information. Applicant will store all past and present employee records within secured digital storage devices that will be secured inside the Inventory room. The Inventory room is a multi-purpose room for management personnel; it will be used for record-keeping, administration,

human resources, and as a security station, in addition to its use as secure storage for cannabis and cannabis products. The Inventory room is under 24-hour surveillance and is only accessible to the manager and governing agencies, as required in accordance with the Bureau of Cannabis Control Regulations Section 5037.

ii. Keep Proper Records in Compliance with State Law

In accordance with Section 20-46.080 of the City Ordinance, Applicant will maintain a copy of its Local Permit and State License on display during business hours in a conspicuous place so that it can be readily seen by all persons entering the facility. Applicant will proudly display and maintain copies of its Local Permit and State License on at the retail reception and welcoming area, so the Permit and License can be immediately seen and reviewed by all persons upon entry to the facility.

Applicant will maintain all required records including a current register of all current and past employees, and patient and sales records, in accordance with the City Ordinance, as well as State laws and regulations, including Bureau of Cannabis Control Regulations Section 5037 (City Ordinance Section 20-46.080).

Customer Sales Records

Applicant will maintain an accurate record of sale for every sale made to a customer, in accordance with Section 5425 of the Bureau of Cannabis Control Regulations. These records will contain the following information: (i) The first name and employee number of the retailer employee who processed the sale; (ii) The first name of the customer and a retailer assigned customer number for the person who made the purchase; (iii) The date and time of the transaction; (iv) A list of all the cannabis goods purchased, including the quantity purchased; and (v) The total amount paid for the sale, including the individual prices paid for each cannabis good purchased and any amounts paid for taxes.

Inventory Documentation

In accordance with Section 5423 of the Bureau of Cannabis Control Regulations, Applicant will also maintain an accurate record of its inventory and will provide the Bureau of Cannabis Control with this record of inventory upon request. The following information will be included in such inventory records; (i) A description of each item in the inventory, such that the cannabis goods can easily be identified; (ii) An accurate measurement of the quantity of the item; (iii) The date and time the cannabis goods were received; (iv) The sell-by or expiration date on any cannabis goods, if any; (v) The name and license number of the licensee that delivered the cannabis goods; (vi) The name and license number of the distributor that provided the cannabis goods to the Applicant retailer; and (vii) The price the Applicant paid for the cannabis goods, including taxes, delivery costs, or any other costs.

Other Records

Applicant will also maintain the following records related to commercial cannabis activity for at least seven years (Bureau of Cannabis Control Regulations Section 5037): (i) 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 under Title 18 of the California Code of Regulations sections 1698 and 4901; (ii) 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 (i.e., an employee register); (iii) Training records, including, but not limited to, the content of the training provided, and the names of the employees that received the training; (iv) Contracts with other licensees regarding commercial cannabis activity; (v) Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity; (vi) Security records, except for surveillance recordings required under section 5044 of the Bureau of Cannabis Control Regulations; (vii) Records relating to the composting or destruction of cannabis goods; and (viii) Documentation for data or information entered into the track and trace system.

Applicant recognizes that the Bureau of Cannabis Control may make any examination of the books and records of any licensee as it deems necessary (*Bureau of Cannabis Control Regulations Section 5037*). Applicant will therefore

keep records in a manner that allows the records to be produced for the Bureau on-site in either hard copy or electronic form, as requested by the Bureau. In accordance with Bureau of Cannabis Control Regulations Section 5037(d), Applicant may choose to contract with a third party to provide custodial or management services of the records, but Applicant also recognizes that this contract will not relieve Applicant of its responsibilities to maintain the records properly.

iii. Publish and Implement a Protocol and Requirements for Patients and Persons Entering the Site

In accordance with Section 5404 of the Bureau of Cannabis Control's Regulations, Applicant will only sell adult-use cannabis goods to individuals who are at least 21 years of age and will only sell medicinal cannabis goods to individuals who are at least 18 years of age, who possess a valid physician's recommendation for his or her self or for a person for whom he or she is a primary caregiver. Applicant will verify the identity and age, and the physician's recommendation if applicable, of all customers before allowing them access into the retail area.

Applicant will train all employees on the following proper customer admittance practices, will re-train all employees monthly, and will ensure this strict protocol is printed and kept in the reception desk so that all employees can access it to refresh their memories at all times.

Applicant plans to allow both medicinal and adult-use customers to enter the retail area. Applicant's employees will be physically present in the retail area at all times when individuals who are not Applicant's employees are in the retail area (Bureau of Cannabis Control Regulations Section 5402). Access to the retail area will be limited to individuals who are either at least 21 years of age, or who are at least 18 years of age with a valid physician's recommendation (Bureau of Cannabis Control Regulations Section 5400).

Returning Customer

All persons wishing to enter the premises will be asked for their ID by an associate who will greet them in the entry at the Reception desk. Returning patients/customers who are 21 or older will present their identification to an associate who will validate their ID. If the returning patient does not meet the 21 years of age minimum, they will be asked for their doctor's recommendation. Even if the patient has already registered the recommendation with Applicant's retail facility, the expiration date will be confirmed each time the customer visits the retail facility. If a person cannot prove they are at least 21 years of age, or 18 years of age with valid identification and valid physician's recommendation, the person will not be allowed to enter the premises. Returning status does not allow entry without valid proof of age and doctor's recommendation (if applicable). All visitors will be logged, and their visit details will be recorded within an integrated database.

New Customer

Persons who are twenty-one and older will be allowed to enter once their identification is verified. New patients who are at least eighteen years old will be asked for their doctor recommendation. The recommendation will be verified prior to the customer entering retail area. Only after documents have been verified will an 18 to 20-year-old be allowed to enter the retail area and to examine Applicant's inventory.

iv. Identify Secured Access and Secured Product Location

Applicant will have limited-access areas where only authorized individuals (such as employees, vendors, contractors, or other people with a business-purpose) will be permitted. This limited-access area encompasses all areas within the facility, aside from the retail area, which includes the Utility room and the Inventory room. (See attached Site Plans). Secured products will be held within the secured Inventory room. Designated safes will be assigned to hold different product types. Separately designated safes will be used to contain all collected, reconciled, and stored cash on-site.

An individual in the limited-access area who is not employed by Applicant (such as a vendor or distributor) will be escorted by Applicant or one of Applicant's employees at all times while within the limited-access areas (Bureau of Cannabis Control Regulations Sections 5042 and 5401). In accordance with Section 5401, any individual within the

limited-access area will be at least 21 years old. Applicant will maintain a log of all authorized individuals who are not employees of the Applicant that enter the limited-access area. The logs will be made available to the Bureau of Cannabis Control upon request. Applicant will not receive consideration or compensation for permitting an individual to enter the limited-access area.

The retail facility is designed to prevent unauthorized entrance into areas containing Cannabis or Cannabis Products and limited-access areas. The facility will have a secure door that will separate the retail area from the Inventory room, where cannabis and cannabis products will be securely stored (*see attached Site Plans*). Products held long-term will be vacuum-sealed to safeguard freshness and to preserve quality and purity of the product. Cannabis and Cannabis Products that are not used for display purposes or immediate sale will be kept in the secured vault and will be stored in a manner reasonably designed to prevent diversion, theft, and loss.

v. Display a Copy of Issued State License

In accordance with Section 20-46.080 of the City Ordinance, Applicant will maintain a copy of its Local Permit and State License on display during business hours in a conspicuous place so that it can be readily seen by all persons entering the facility. Applicant will proudly display and maintain copies of its Local Permit and State License on at the retail reception and welcoming area, so the Permit and License can be immediately seen and reviewed by all persons upon entry to the facility.

d. Deliveries, On-Site Consumption

Deliveries

Applicant proposes to occupy an existing industrial building located at 2074 Armory Drive. Applicant seeks to obtain a Conditional Use Permit for only a medicinal and adult use Cannabis Retail Storefront. Applicant does *not* plan to deliver Cannabis and Cannabis Products to patients and consumers located outside the Cannabis Retail Facility.

On-Site Consumption

Section 26200 of the California Business and Professions Code states that “a local jurisdiction may allow for the smoking, vaporizing, and ingesting of cannabis or cannabis products on the premises of a retailer or microbusiness,” however, “access to the area where cannabis consumption is allowed [must be] restricted to persons 21 years of age and older” and “cannabis consumption [must not be] visible from any public place or nonage-restricted area.” The City of Santa Rosa allows for on-site consumption (City Ordinance Section 20-46.080(F)); however, the City does not allow the smoking or vaping of cannabis products on-site. Applicant does not plan to allow on-site consumption of cannabis products by patients or adult use customers. The entrance to Applicant’s retail facility will be clearly and legibly posted with a notice indicating that smoking and vaping of Cannabis is prohibited on site or in the vicinity of the site except as permitted in accordance with Chapter 9-20 (Smoking Regulations) and State Law.

According to the City Ordinance, employees of a Cannabis Retail facility who are qualified patients may consume medical Cannabis or Cannabis Products on-site within designated spaces not visible by members of the public, provided that such consumption is in compliance with Chapter 9-20 (Smoking Regulations) and State law. Accordingly, Applicant plans to allow on-site consumption for employees who are qualified medicinal cannabis patients. Such allowed consumption by employees who are qualified patients will occur in the designated break area for use only by employees.

e. Special Events

As stated above, Applicant does not propose to hold any special events on-site. If applicant does decide to hold a special event at the retail location in the future, Applicant will consult with the City and the State to ensure it acquires all necessary permits, licenses, and approvals prior to holding a special event.

f. Storefront, Signage, and Window Treatments

The design of the facility will be “Sonoma County Modern.” Applicant will change the exterior building color, awning, signage, and lighting. Applicant will use Kendall Charcoal to paint the façade a deep grey color with rust-colored accents. (See previously submitted Exterior Material Palette). Applicant will use a mix of corten lettering and raw brass lettering for signs and addresses. (See previously submitted Exterior Material Palette). Applicant will also add a suspended corten awning with blue burned fir to the exterior of the building. (See previously submitted Exterior Material Palette). Additionally, Applicant will add LED sign lighting over building numbers. Further information about the storefront, including colors, signage, and landscaping, will be described under “Description of Enhanced Retail Experience” on pages 18 through 19 below.

The entrance to Applicant’s retail facility will be clearly and legibly posted with a notice indicating that smoking and vaping of Cannabis is prohibited on site or in the vicinity of the site except as permitted in accordance with Chapter 9-20 (Smoking Regulations) and State Law.

g. Site Management Plan

Please see below for responses to Site Management merit-based review criteria.

h. Responses to Merit-Based Review Criteria

1. Local and State Compliance (i. State regulations; ii. County/regional permit requirements; iii. Santa Rosa General Plan policies; iv. Santa Rosa City Code locational and operational requirements)

As has been discussed throughout this Project Narrative, and will be discussed in further detail below, Applicant understands that it must operate in full compliance with state regulations, county/regional permit requirements, Santa Rosa General Plan policies, and Santa Rosa City Code locational and operational requirements. Applicant will go to great lengths to ensure its retail facility remains compliance with all applicable codes and regulations, including consistent review of both local and state laws and regulations. Throughout this Project Narrative, Applicant has maintained that it will follow the laws outlined in MAUCRSA and the Bureau of Cannabis Control Regulations. Further, Applicant is discussed in detail below, Applicant will maintain a Sonoma County Health Permit. Applicant has considered General Plan policies in the crafting of this Project Narrative and will ensure its operations maintain these considerations. Applicant has also ensured that its proposed location is properly zoned and is set back in excess of 600 feet from the nearest school.

2. Site Management

i. – ii. About the Applicant & Applicant’s Dedication to the City of Santa Rosa; Qualifications and Backgrounds of Principals; Applicant’s Experience in the Cannabis Industry

One of the Guiding Principles of the City of Santa Rosa’s General Plan is to “focus employment development strategies to retain and expand existing businesses and welcome new businesses which reinforce the community identity, exhibit sustainable business practices, and which have a long term, vested interest in Santa Rosa.” As will be made clear in the following sections, Applicant has a vested interest in and desire to see the success of the City and its inhabitants. In all Cities in which Applicant does business, it puts forth strong efforts into community engagement and enhancement. The projects that Applicant engages in include: 1) patient education; 2) support of community charities; 3) affordable medicine access programs; 4) community engagement and environment consciousness, 5) public safety; and 6) support of local commerce and jobs.

Brian Bjork, the applicant operator, is the founder and operator of The Bjork Group. Between October 2011 and January 2018, The Bjork Group launched two other continuously-operating, successful, cannabis businesses in Marin County. Overall, Mr. Bjork has more than 15 years of experience in the cannabis industry and has been a consistent state and federal taxpayer and well-regarded member of his local community. Mr. Bjork’s professional experience spans nearly all aspects of the California state-compliant cannabis industry from cultivation to retail sales. He prides himself on operating businesses that focus on regulatory compliance, customer service, low

community impacts, and working as a partner with local law enforcement and other local businesses. This is the spirit, engagement, and intention Mr. Bjork will bring to operations in Santa Rosa. (See previously submitted Resume).

In addition to Mr. Bjork's seasoned leadership, The Bjork Group has engaged, experienced, capable senior managers (see previously submitted Resumes) to ensure the highest standards of day-to-day operations, compliance, and customer service. Specifically, The Bjork Group, doing business as Marin Gardens ("MG"), has operated a state-compliant medical cannabis delivery business in San Rafael since 2015 and brings with it a strong record of customer service, compliance, and financial stability. MG conducted approximately 30,000 safe and properly-documented cannabis deliveries in 2016 and 2017 in accordance with the laws of the State of California. In January 2018, MG received a temporary California State Delivery Only Retail License for its location in the City of San Rafael, in compliance with MAUCRSA. In February 2018, The Bjork Group, doing business as Sonoma Gardens, was granted a conditional use permit from the City of Santa Rosa Zoning Administrator for cultivation, manufacturing, and distribution at 970 Piner Road (CUP17-032).

Applicant's business model includes offering high level of client consultation through a walk-in retail storefront business. Based on more than five years' experience serving medical cannabis patients in Marin, customers have come to value Applicant's professionalism, responsiveness and affordable prices. Applicant takes pride in supporting local charities and improving the quality of our customers' lives in every way that it can. In this way, Applicant has built its reputation as a fair and ethical business, and a partner to the community.

iii. Business Plan

Retail Storefront Details

According to City Ordinance Section 20-70.020 "Cannabis Retail" means "a facility where Medical or Adult Use Cannabis or Medical or Adult Use Cannabis Products are offered, either individually or in any combination, for retail sale, including an establishment that delivers Cannabis or Cannabis Products as part of a retail sale. Such a facility is also known as a cannabis 'dispensary'." Applicant proposes a medical and adult-use retail storefront space of approximately 1,700 square feet. Under this retail use, Applicant proposes to sell cannabis and cannabis products to medicinal and adult-use customers. Under Section 5412 of the Bureau of Cannabis Control Regulations, Applicant is not permitted to package or label cannabis or cannabis products on the retail premises. All cannabis or cannabis products sold by Applicant within the retail space will be packaged and labeled prior to arriving at the retail premises. Applicant will maintain a copy of its Local Permit and State License on display during business hours in a conspicuous place so that it can be readily seen by all persons entering the facility.

Track and Trace Compliance

The State's track and trace system is designed to record the movement of cannabis and cannabis products through the supply chain, from cultivation to sale. This will help ensure that if a public safety concern arises, the source will be identifiable. In accordance with State laws and regulations, Applicant will report the disposition of all commercial cannabis activities and all other required information in the track and trace system within 24 hours of occurrence once access to the track and trace system is available. Applicant will ensure all data entered into the track and trace system is correct and that any information entered in error is corrected immediately upon discovery of the error. If at any time Applicant loses access to the track and trace system, Applicant will prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access.

Applicant will designate at least one owner to be the track and trace system account manager. Such owner will have the responsibility (i) to designate authorized track and trace system users (employees) and require proper training of these users; (ii) to maintain an accurate and complete list of all track and trace system account managers and users and update the list and individual access credentials immediately upon any change; (iii) obtain UID tags from the Department of Food and Agriculture and ensure a sufficient supply is available at all times; (iv) ensure all inventory is tagged and entered into the track and trace system; (v) correct any information

that is incorrectly entered into the system within three (3) business days of discovery of the error; and (vi) monitor all notifications from the track and trace system and resolve all issues identified in the notification.

According to Bureau of Cannabis Control Regulations Section 5052, while Applicant operates under a temporary State License, Applicant will not be required to record commercial cannabis activity in the track and trace system but must still record all commercial cannabis activity with sales invoices and receipts, in accordance with Bureau of Cannabis Control Regulations, MAUCRSA, and any other applicable laws and regulations.

Retail Experience

The entire retail space will be visible upon entry. Applicant will have a designated entry and exit to manage the flow of customer traffic (*see attached Elevations; also see attached View of Storefront Entrance from Public Right of Way*). Applicant will also have a small lounge area inside the retail facility for customer welcoming, identification checking, and information gathering (*see attached Floor Plans*).

Approaching the facility, a charcoal and wood building will be visible. Modest signage announcing Sonoma Gardens will welcome individuals from the store front. On the large door, a brass "SG" will be displayed.

Upon arrival, a Safety-team member will greet each visitor as they direct them to the reception area. The reception area will provide registration for new patients/members, as well as a check-in station for existing patients/members. The reception area will be complete with separate new member and returning member check-in stations. Guests will be able to take advantage of the comfortable seating area, entertainment center, water cooler, and educational materials while filling out member intake forms. The reception area will be a relaxing, warm, comfortable and inviting environment. Once sign-up and check-in is complete, Members will be greeted by a Patient Liaison who will provide a thorough introduction of Sonoma Gardens offerings and services. The Patient Liaison will offer an overview of the layout out of the sales floor, product arrangement, types of products and services offered.

The Sales floor will be well lit and well organized. It will offer an open floor plan with ample light for product-viewing, clean surfaces, and features made of wood and polished concrete. The product selection will cover an expansive and complete variety but will be presented in such a way that it is manageable and not overwhelming. Product displays will be complete with usage and producer information. The sales counter will offer a concierge desk for pick-up of online orders, for asking general questions, and for requesting help with other products and services. The stations will be clean, well maintained and well organized and will be fitted with high-end finishes and fixtures. Staff will also be available on the floor for additional aid. The atmosphere will be calm, serene, and relaxing. The service experience as a whole will be smooth and will highlight the operation's efficiency and professionalism.

Members who have completed their visits will be thanked and given a fare-well by Staff and Security. All members will be offered an escort or assistance getting to their vehicle or ride in any cases of need.

Secured Products

As was discussed in detail above, the retail facility is designed to prevent unauthorized entrance into areas containing Cannabis or Cannabis Products and limited-access areas. Applicant will have limited-access areas where only authorized individuals (such as employees, vendors, contractors, or other people with a business-purpose) will be permitted. This limited-access area encompasses all areas within the facility, aside from the retail area, which includes the Utility room and the Inventory room. (*See attached Site Plans*).

The facility will have a secure door that will separate the retail area from the Inventory room, where cannabis and cannabis products will be securely stored. (*See attached Site Plans*). Secured products will be held within the secured Inventory room. Designated safes will be assigned to hold different product types. Separately designated safes will be used to contain all collected, reconciled, and stored cash on-site. Cannabis and Cannabis Products that are not used for display purposes or immediate sale will be kept in safes within the

secured Inventory room and will be stored in a manner reasonably designed to prevent diversion, theft, and loss. The Inventory room will be under 24-hour surveillance and will only be accessible to the manager and governing agencies, as required in accordance with the Bureau of Cannabis Control Regulations Section 5037. Products held long-term will be vacuum-sealed to safeguard freshness and to preserve quality and purity of the product.

Cannabis Goods Displays

In accordance with Bureau of Cannabis Control Regulations Section 5405, cannabis goods for inspection and sale will only be displayed in the retail area and will not be displayed where it is visible from outside the facility. In accordance with Bureau of Cannabis Control Regulations Section 5405(c), cannabis goods may be removed from their packaging and placed in containers to allow for customer inspection. The containers will not be readily accessible to customers without assistance of Applicant or Applicant's employees, and the container will be provided to the customer by Applicant or Applicant's employee, who will remain with the customer at all times that the container is being inspected by the customer. Cannabis goods that are removed from their packaging for display will not be sold or consumed and will be destroyed when the cannabis goods are no longer used for display.

Cannabis Goods for Sale

In accordance with Bureau of Cannabis Control Regulations Section 5406, Applicant will not make any cannabis goods available for sale to a customer unless (i) the cannabis goods were received from a licensed distributor; (ii) Applicant has verified that the cannabis goods have not exceeded their expiration or sell-by date, if one is provided; and (iii) in the case of manufactured cannabis products, the product complies with all requirements of Section 26130 of the California Business and Professions Code (described below) and all other relevant laws.

According to Section 26130 of the California Business and Professions Code, edible cannabis products must be (1) designed to not be appealing to children or easily confused with commercially sold candy or foods that do not contain cannabis; (2) produced and sold with a standardized concentration of cannabinoids not to exceed ten (10) milligrams tetrahydrocannabinol (THC) per serving; (3) delineated or scored into standardized serving sizes if the cannabis product contains more than one serving and is an edible cannabis product in solid form; (4) homogenized to ensure uniform disbursement of cannabinoids throughout the product; (5) manufactured and sold under sanitation standards established by the State Department of Public Health; and (6) provided to customers with sufficient information to enable the informed consumption of the product, including the potential effects of the cannabis product and directions as to how to consume the cannabis product, as necessary.

Sale of Non-Cannabis Products

According to Section 5407 of the Bureau of Cannabis Control Regulations, "A retailer may sell non-cannabis products on a licensed premises if the licensee remains in compliance with any city, county, and state laws or regulations related to those products. This provision excludes alcohol and alcohol products and tobacco and tobacco products from sale at any licensed premises." Applicant will not sell any alcohol, alcohol products, tobacco, or tobacco products on the premises.

Sale of Cannabis Paraphernalia

Applicant proposes to sell cannabis paraphernalia onsite. Such paraphernalia will be limited to ancillary vaporizer devices.

Sale of Edible Products

Applicant plans to sell edible products. As will be explained in detail below, Applicant will therefore obtain a Sonoma County Health Permit and will comply with Health and Safety Code Section 13700 et seq. and Sonoma

County Health permit requirements, in accordance with City Ordinance Section 20-46.070. Applicant understands that these requirements provide a system of prevention and overlapping safeguards designed to minimize foodborne illness, ensure employee health, demonstrate industry manager knowledge, ensure safe food preparation practices and delineate acceptable levels of sanitation for preparation of edible products.

Sale of Live Plants

Applicant plans to sell live, immature cannabis plants and seeds. In accordance with Bureau of Cannabis Control Regulations Section 5408, Applicant will only sell such seeds if (i) the plant is not flowering; (ii) the plant or seed was purchased from a nursery that holds a valid Type-4 Nursery Cultivation license under MAUCRSA; and (iii) a label is affixed to the plant or package containing seeds which states, "This product has not been tested pursuant to the Medicinal and Adult-Use Cannabis Regulation and Safety Act." Applicant will not sell any other live plants, nor will applicant apply or use any pesticides on the live plants.

Daily Limits

In accordance with Section 5409 of the Bureau of Cannabis Control's Regulations, Applicant will not sell more than the following amounts of cannabis, cannabis products, or cannabis plants to an adult-use cannabis customer:

- 28.5 grams of non-concentrated cannabis in a single day to a single customer; and
- 8 grams of concentrated cannabis, including concentrated cannabis contained in cannabis products, in a single day to a single customer; and
- 6 immature cannabis plants, in a single day to a single customer.

Furthermore, Applicant will not sell more than the following amounts to a medicinal cannabis customer:

- 8 ounces of medicinal cannabis in a single day to a single medicinal cannabis customer; or

If a valid physician's recommendation contains a different amount than 8 ounces, the medicinal cannabis customer may purchase an amount of medicinal cannabis consistent with the patient's needs as recommended by a physician.

Sonoma County Health Permit

The City Ordinance (Section 20-46.070) states that cannabis businesses that sell or manufacture edible medical cannabis products shall obtain a Sonoma County Health Permit. Although Applicant will not manufacture edible products, Applicant plans to sell edible products, and will therefore obtain a Health Permit from Sonoma County prior to operating its retail facility. Applicant recognizes that no person can operate in the county or in any incorporated city in the county, any food facility or any other enterprise or establishment in which food or beverage is offered for sale or sold, without a valid permit or registration issued by the health officer. Therefore, Applicant will ensure its operations meet the specifications of the Sonoma County Retail Food Ordinance, and the provisions of the California Retail Food Code.

In order to obtain the requisite Health Permit, Applicant will first contact a Sonoma County Food Inspector, who will determine whether the facility needs a site review and who will recommend the proper permitting process that Applicant must follow. Once Applicant is aware of the proper permitting process, per the Food Inspectors' recommendations, Applicant will submit all required documents and information to Sonoma County's Health Department, including site plans, as necessary. Once Applicant's plans are approved, Applicant will schedule an on-site construction inspection, as necessary. After the site inspection, Applicant will Apply for the Food Facility Operating Permit. Once Applicant obtains the permit from Sonoma County,

Applicant will post the permit in a conspicuous place within the food facility and will maintain its permit in accordance with local laws and regulations, as well as the California Retail Food Code.

In accordance with this permit and the California Retail Food Code, Applicant (as a permit holder) will designate a person (or persons) in charge and will ensure that a person in charge is present at the facility during all hours of operation. This person in charge and all food employees will have adequate knowledge of, and will be properly trained in, food safety as it relates to each of their assigned duties. This knowledge will include major food allergens and safe food handling practices.

Food Safety Certification Examination

Applicant understands that the California Retail Food Code requires that there be at least one food safety certified owner or employee at every food facility, although this certified owner or employee does not need to be present at the food facility during all hours of operation. Applicant will ensure an owner or employee of Applicant has successfully passed an approved and accredited food safety certification examination. Such food safety certificate will be retained on file at the food facility at all times and will be made available for inspection by the enforcement officer. Furthermore, such certified individuals will be recertified every five years.

Customer Returns of Cannabis Goods

A "customer return" means a customer's return of cannabis goods that were purchased from Applicant, back to the Applicant. In accordance with Bureau of Cannabis Control Regulations Section 5410, Applicant may accept customer returns of cannabis goods that were previously sold to a customer but will not resell cannabis goods that have been returned. Applicant will treat any cannabis goods abandoned on the premises as a customer return (*Bureau of Cannabis Control Regulations Section 5410*).

Free Cannabis Goods

In general, Applicant will not provide free cannabis goods to any person and will not allow employees to provide free cannabis goods to any person on the licensed premises. However, in accordance with Bureau of Cannabis Control Regulations Section 5411, in order to provide access to medicinal cannabis to patients who have difficulty accessing medicinal cannabis goods, Applicant may provide free medicinal cannabis to those in need. Applicant will ensure that: (i) free cannabis goods are provided only to a medicinal cannabis patient or primary caregiver for the patient in possession of a valid ID card and physician's recommendation; (ii) the cannabis goods comply with all laboratory testing requirements; (iii) prior to being provided to the patient or primary caregiver, the cannabis goods have been properly recorded in the track and trace system as belonging to the retailer; (iv) the cannabis goods will not leave the premises unless placed in an opaque package, as required for purchased cannabis goods; (v) the cannabis goods will be applied toward the daily limit purchased by a medicinal cannabis customer; and (vi) the transaction will be properly recorded in Applicant's inventory records and the track and trace system. Applicant may also donate cannabis goods and the use of equipment in compliance with any compassionate use, equality, or other similar program administered by the City of Santa Rosa.

Packaging and Labeling

In accordance with Section 5412 of the Bureau of Cannabis Control Regulations, Applicant will not accept, possess, or sell cannabis goods that are not packaged as they will be sold at final sale in accordance with all State laws and regulations. Applicant will not package or label cannabis or cannabis products on the retail premises. All cannabis or cannabis products sold by Applicant will be packaged and labeled prior to arriving at the retail premises. All cannabis goods purchased by a customer will not leave the Applicant's retail premises unless the goods are placed in an opaque exit package (*Bureau of Cannabis Control Regulations Section 5413*).

iv. Management Plan for Nuisance Impacts

Applicant understands that there are inherent risks with running a cannabis retail facility; however, Applicant is dedicated to providing comprehensive security measures for itself and its neighbors. Applicant will have 24-hours security personnel on site, which will be effective in mitigating risks to the Subject Property. Applicant will also maintain relationships with the residents of the neighborhood, neighboring merchants, the property owner, and local law enforcement in the event of any nuisance activities at Applicant's facility or in the surrounding neighborhood. Applicant will respond to any concerns within a timely manner, and as necessary, will request the assistance of local law enforcement. Additionally, Applicant will ensure the facility, the parking lot, and the surrounding sidewalks and street remain free from trash and debris on a daily basis.

Applicant will be accessible to neighboring tenants and residents to discuss any issues and will work with neighboring merchants to mitigate any issues that do or could arise. All concerns and complaints will be addressed by senior management of Sonoma Gardens and/or directors for the Bjork Group. Management will be present and available to meet with concerned neighbors at the Bjork Group's office at 100 Woodland Ave., Suite 202, San Rafael, CA 94901, or at another mutually-agreed upon location.

Applicant is committed to being a good neighbor. It is Applicant's practice to contract for regular maintenance and 24-hour on-site security to ensure that operations do not attract undesirable activities or create a noisy environment. Applicant will take reasonable steps to discourage and correct objectionable conditions that could constitute a nuisance in the retail facility, the parking areas, sidewalks, alleys, and areas surrounding the premises and adjacent properties. Applicant's security personnel will perform regular sweeps of the premises and surrounding neighborhood and will actively report any nuisances, loitering, criminal, or unauthorized activity. All of Applicant's retail staff and security personnel will take steps to discourage nuisance impacts such as loitering and trash build-up. These steps will include (i) first requesting that those engaging in nuisance activities cease the activities unless the personal safety of Applicant would be jeopardized in making such a request; and (ii) then calling the police in a timely manner.

Moreover, Applicant's facility is directly next door to the Junior College's campus police, which will likely serve as a deterrent to unlawful activities and mischief and will support timely police response should the need arise. The proximity of the dispensary to local law enforcement will enable easy communication, coordination, and the fostering of a strong partnership to maintain harmonious operations with surrounding businesses and residents.

Applicant also employs a Street Team (which will be discussed in further detail below) that actively participates in daily litter removal and neighborhood beautification projects and works in conjunction with the on-site security personnel as a deterrent to nuisance behaviors. The Street Team also notifies security personnel of any suspicious activities around the premises and the adjacent neighborhood.

In addition to the steps outlined above, Applicant is committed to increasing public safety in the communities where it operates through: 1) diligent hiring and training practices; and 2) improved lighting and security monitoring.

Hiring and Training

All of Applicant's employees will undergo full criminal background checks. All employees will undergo a three-month probationary period before becoming permanent employees, eligible for benefits, raises and on-going reviews. Employees will undergo formal training to acquaint them with all applicable state and local regulations affecting their roles as well as company rules and guidelines to which they must adhere. Failure to adhere to local and state laws and regulations, and company policies and guidelines will result in termination.

Security Monitoring

See previously submitted Confidential Security Plan for further information.

v. Performance Timeline: From Land Use Approval to Opening the Facility

As soon as Applicant is granted a Conditional Use Permit for this retail facility, Applicant will begin the building plan check and build-out process. Applicant is currently working with a designer to help create a comprehensive design plan for the facility. After CUP approval, Applicant anticipates that design and construction documentation will take eight weeks. Following this, Applicant will work through the Building Plan Check process with the City of Santa Rosa. Applicant will then begin construction at the facility as soon as Building Permits are granted.

3. Neighborhood Compatibility

i. Description of How the Use will Fit into the Stability and Quality of the Surrounding Neighborhood

The Subject Property is in the General Commercial (CG) zone. According to the City of Santa Rosa Zoning Code, "The CG zoning district is applied to areas appropriate for a range of retail and service land uses that primarily serve residents and businesses throughout the City, including shops, personal and business services, and restaurants. Residential uses may also be accommodated as part of mixed use projects, and independent residential developments. The CG zoning district is consistent with the Retail and Business Services land use classification of the General Plan." According to the City of Santa Rosa's General Plan, this Land Use "allows retail and service enterprises, offices, and restaurants." Not only has the City of Santa Rosa expressly allowed Applicant's proposed use within this zone through its Zoning Ordinance, but Applicant's facility will fit succinctly into this existing description, as it will conduct retail activity. Additionally, Applicant's facility will help to fill a vacancy in the commercial and industrial structures within the City of Santa Rosa, which is a stated goal within the Economic Vitality section of the General Plan.

The Subject Property is on Armory Drive close to the corner of Armory Drive and Sucher Lane. The Subject Property is immediately abutted by Retail and Business Service zoned parcels to the north, south, and west. To the east, behind the Subject Property, lies a Low Residential Zone (*See previously submitted Zoning and Vicinity Maps*).

The proposed project site is located within 300 feet of residential uses, and therefore, a Neighborhood Meeting is required. This Neighborhood Meeting is scheduled for Wednesday June 20, 2018.

ii. Description of Odor Control Measures

Odor Control Measures are described in detail under "Odor Mitigation Plan" on page 4 above.

iii. Description of Enhanced Retail Experience

Facility Design

Applicant is dedicated to ensuring this retail facility fits succinctly into the Armory Drive neighborhood by providing an enhanced retail experience with a fluid and attractive site plan including quality materials, all in accordance with the Land Use and Livability Goals and Policies of the General Plan. Applicant recognizes that one of these goals and policies is to "maintain vibrant, convenient, and attractive commercial centers." Applicant will do this through attractive facility design, enhanced customer experience, and ease of pedestrian and bicyclist access to the facility. (*See attached Site Plans and previously submitted Interior and Exterior Material Palettes*).

The design of the facility will be "Sonoma County Modern." The aesthetic will make use of a white oak ceiling, blue burned wood feature walls, zinc wall planters, sand blasted concrete, and blackened steel wainscoting, signage and displays (*see previously submitted Interior Material Palette*). Applicant will use graphic signage, including blackened steel soffit edges and raw brass lettering, above display areas and casework (*see previously submitted Interior Material Palette*). The entire retail space will be visible upon entry. Applicant will have a designated entry and exit to manage the flow of customer traffic (*see attached Floor Plans*). Applicant will also

have a small lounge area inside the retail facility for customer welcoming, identification checking, and information gathering. (See attached Floor Plans).

Applicant will change the exterior building color, awning, signage, and lighting. Applicant will use Kendall Charcoal to paint the façade a deep grey color with rust-colored accents. (See previously submitted Exterior Material Palette). Applicant will use a mix of corten lettering and raw brass lettering for signs and addresses. (See previously submitted Exterior Material Palette). Applicant will also add a suspended corten awning with blue burned fir to the exterior of the building. (See previously submitted Exterior Material Palette). Additionally, Applicant will add LED sign lighting over building numbers. Applicant will not advertise or market cannabis or cannabis products on an advertising sign within 1,000 feet of a day care center, school providing instruction in kindergarten or any grades 1 through 12, playground, or youth center.

One of the Goals and Policies of the Open Space and Conservation section of the Santa Rosa General Plan is to “Promote the use of site planning, solar orientation, cool roofs, and landscaping to decrease summer cooling and winter heating needs. Encourage the use of recycled content construction materials.” At the Subject Property, Applicant plans to implement energy-efficient lighting and water-conscious faucets, and will use refurbished materials for many furniture needs. Because this is solely a proposal for a retail space, Applicant anticipates minimal water usage at the facility; nevertheless, all hardware in the facility will be water efficient. The style and design of all hardware and materials will be in keeping with the Sonoma County Modern concept. Applicant will emphasize recycled woods, LED lighting, and recycled content materials in the finer details. The incorporation of non-organic materials and natural and neutral color tones will be used to minimize visual impact of the facility.

Landscaping

Applicant will improve the landscaping on site. Applicant plans to install corten planters along the front of the building and will plant native grasses within these planters. (See previously submitted Interior and Exterior Material Palettes). These additions will improve the site, while also remaining water-conscious and environmentally friendly.

Interior Building Changes

Applicant will modify the interior of the building to accommodate the cannabis retail storefront. The space within the building that will accommodate each of the uses will be designated as follows: (also see attached Site Plans)

Use	Room Name	Size (in Square Feet)
Retail	Reception	776
	Retail Display	710
	Point of Sale Counter	214
	TOTAL RETAIL	1,700 SQUARE FEET
Other/Accessory Uses	Inventory	412
	Hallway	69
	Restroom	76
	Utility	56
TOTAL OTHER/OFFICE		613 SQUARE FEET

iv. Demonstrate a Clear and Attractive Entrance, Pedestrian Orientation, Bike Parking, and Access to Transit

Clear and Attractive Entrance

The entrance to Applicant's facility, including the signage plan, is described under "Facility Design" on page 18, above. Additionally, interior changes to Applicant's retail space are discussed above under "Description of Enhanced Retail Experience" on pages 18-19.

In accordance with City Ordinance Section 20-46.080, the storefront entrance of the retail facility will be in a visible location that provides an unobstructed view from the public right of way. As was discussed in detail above, no adult-use customer will be permitted to enter the retail space without government issued photo identification and no medical cannabis customer will be permitted to enter the retail space unless the medical customer possesses a valid government-issued photo identification card and a valid physician's recommendation under Section 11362.712 of the Health and Safety Code.

Pedestrian Access to the Facility

One of the goals of the Transportation section of Santa Rosa's General Plan is to "orient building plans and pedestrian facilities to allow for easy pedestrian access from street sidewalks, transit stops, and other pedestrian facilities, in addition to access from parking lots." Another goal of the Transportation section of the General Plan is to "Require construction of attractive pedestrian walkways and areas in new residential, commercial, office, and industrial developments. Provide landscaping or other appropriate buffers between sidewalks and heavily traveled vehicular traffic lanes, as well as through and to parking lots. Include pedestrian amenities to encourage and facilitate walking."

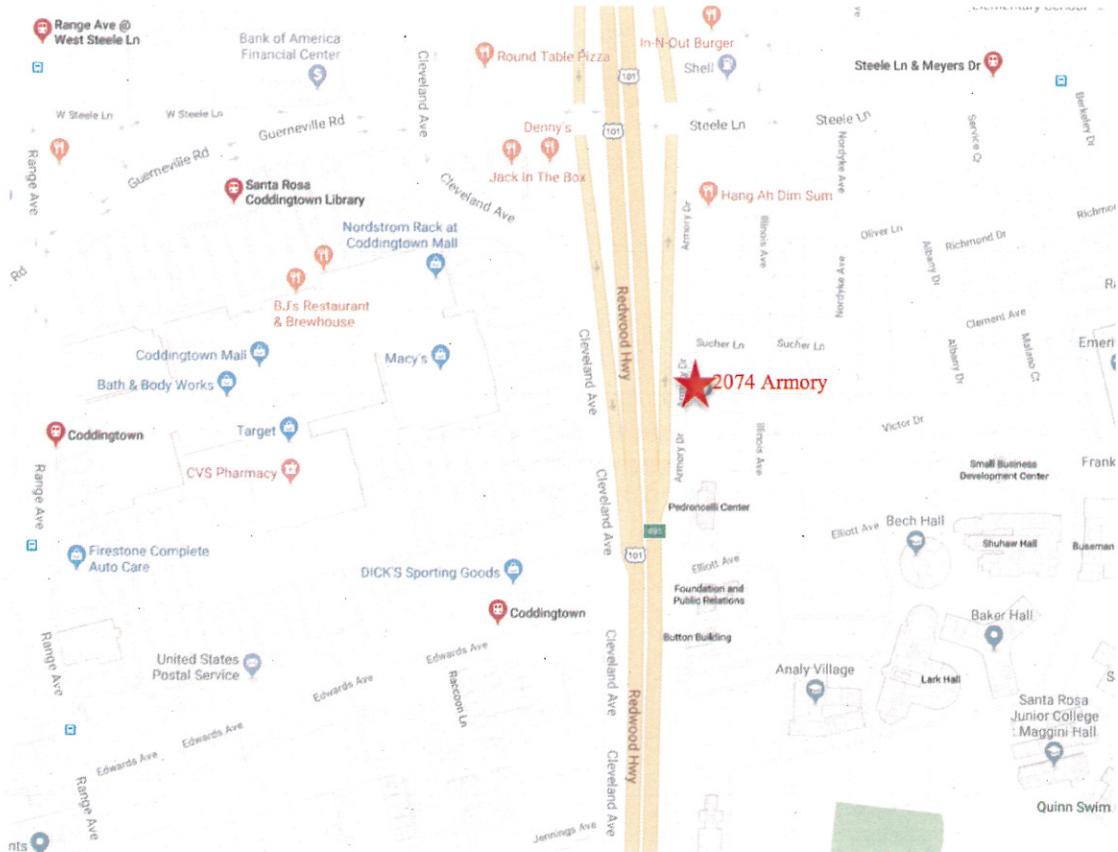
Applicant's facility is on Armory Drive close to the corner of Armory Drive and Sucher Lane. The east side of Armory Drive has sidewalks with ample street lighting. These attributes will help to encourage pedestrian access to Applicant's facility, rather than solely vehicle based access. Additionally, Applicant's facility is located in close proximity to a neighborhood, as well as many bus stations, which will be discussed in detail below. These many attributes will help to facilitate both pedestrian and bicycle access, rather than sole reliance on single-occupancy vehicles.

Access to Transit - Transportation to the Facility: Bicycling, Walking & Public Transit

Moreover, in furtherance of the goal of locating essential commercial services in proximity to housing, Applicant's facility backs up to a residential neighborhood. This close proximity would allow individuals who will live in this community to walk or bike to Applicant's retail space.

Part of Santa Rosa's vision for 2035 is that "frequent, convenient transit service allows local residents to use transit as an alternative to driving." The Subject Property is located conveniently close to many bus stations, which will allow bicyclists and pedestrians who do not live nearby to enjoy easy access to applicant's retail space. This will help to reduce automobile traffic associated with the facility. The map below shows the many bus stations surrounding Applicant's facility.

The closest bus station at Steele Lane and Meyers Dive is 0.3 miles from Applicant's facility. It would take a pedestrian approximately seven (7) minutes to walk and two (2) minutes to bike from this bus station to Applicant's facility. (See visuals below). This is especially important for medicinal cannabis customers who will be able to access Applicant's facility via public transit routes.



Bike Parking

As described in further detail above on page 6 under “Parking Analysis”, in furtherance of reducing dependence on the automobile while also attracting a regional clientele, and in accordance with the City of Santa Rosa’s Design Guidelines for parking, bicycle parking will be provided at Applicant’s facility (*see Site Plans*).

Traffic

Standard staffing for the facility will be approximately eight (8) full-time and four (4) part-time employees who will arrive and leave daily for work shifts from the hours of 8:00 A.M. to 10:00 P.M. Deliveries to and shipments from the facility by vendors will occur approximately once per week. These deliveries and shipments will generally be by van-sized vehicles, but occasionally, a larger box truck will be used.

4. Neighborhood Enhancement

i. Improvements

Site and building improvements are discussed above on pages 18 through 19 under "Description of Enhanced Retail Experience". These include improvements to signage, and interior and exterior changes. As will be discussed in further detail below, Applicant believes that service to the community surrounding its business is of the utmost importance. Applicant has a "Street Team" of employees that will be active in local neighborhoods. This Street Team will help to beautify the area surrounding 2074 Armory Drive, and the adjacent residential neighborhoods. Applicant plans to employ lower-income individuals and to invite local community volunteers to help with these Street Team cleanups.

ii. Integration of Project

Site and building improvements are discussed above on pages 18 through 19 under "Description of Enhanced Retail Experience". These sections include information on the materials and colors that will be used both on the exterior and interior of the retail space, and exterior landscaping plans. Setbacks are discussed under "Location Requirement & Setbacks" on page 7, above (*also see attached Vicinity Map Denoting Closest Schools*). Parking is discussed in detail under "Parking Analysis" on page 6, above. Access to the retail center is provided via a driveway on Armory Drive. Please see previously-submitted site plans for further detail regarding parking, circulation, and driveways.

iii. Environmental Benefits

Whenever possible, Applicant purchases its products from companies whose packaging is compostable or recyclable. With regard to the opaque packaging that Applicant provides at final sale of products, Applicant is committed to making such packaging as environmentally benign as possible while adhering to all requirements of Bureau of Cannabis Control Chapter 3, Section 5413.

Applicant plans to install corten planters along the front of the building and will plant native grasses within these planters. (*See previously submitted Interior and Exterior Material Palettes*). These additions will improve the site, while also remaining water-conscious and environmentally friendly.

iv. Community Benefits

In all Cities in which Applicant does business, it puts forth strong efforts into community engagement and enhancement. The projects that Applicant engages in include: 1) patient education; 2) support of community charities; 3) affordable medicine access programs; 4) community engagement and environment consciousness, 5) public safety; and 6) support of local commerce and jobs.

Patient Education

Applicant has had a long-standing educational partnership with United Patients Group (UP). Applicant regularly refers patient-customers with questions about their medications to UP and supports UP's work through financial contributions and regular volunteerism by Applicant's employees and managers. Beyond its support for UP, Applicant is committed to expanding customer and community educational programs and includes in its operating budget annual amounts to fund community education talks, open-houses and seminars, which it anticipates conducting in conjunction with UP, other health provider organizations, and law

enforcement in the City of Santa Rosa and Sonoma County. In addition to periodic special presentations, Applicant also will expand resources on its website to include educational articles and blogs to promote safe, responsible medical use of cannabis.

Charitable Giving

Applicant has a long record of charitable contributions and sponsorship. This is an important part of Applicant's participation in the communities it serves and will be a continuing commitment in the City of Santa Rosa and Sonoma County. Charitable contributions by Applicant include local charity donations, hosting of charitable and educational events, and providing employment opportunities for underprivileged individuals. Additionally, the Applicant's street team is already active with community and neighborhood litter pickups (*discussed in further detail below*).

Applicant looks to its customers for guidance in charitable support. It solicits recommendations and requests from customers to focus on the organizations that are most important in their lives and to their families. Applicant will continue this practice going forward within the City of Santa Rosa and Sonoma County.

Affordable Access to Medicine

The Bjork Group maintains access programs to make sure low-income customers and military veterans have safe, affordable, legal access to cannabis medicines. This allows for a 10% discount on medical cannabis products. These programs will be administered in a way that is consistent with Bureau of Cannabis Control Chapter 5 § 5411.

Applicant also strives to provide competitive and affording pricing to all customers. For this reason, Applicant from time to time offers, and will continue to offer, volume discounts for like-kind purchases. Under Applicant's volume discount program, all products will be properly tracked and accounted as inventory and sales. Any volume discounts will be counted against daily customer limits, in accordance with Bureau of Cannabis Control Chapter 5 § 5411(b)(5).

Community Engagement and Environmental Consciousness

Applicant believes the help it provides to individual customers in crisis or who need help with a medical condition is the most important part of our business. Applicant considers itself part of the communities it serves. This includes any number of one-off actions from helping one customer find the right medicine to help with her deal with the grief of losing her husband, to sponsorship of adult recreational soccer and basketball teams.

Applicant prides itself on being a local business presence and its managers are locally available to hear and address questions or concerns from customer or other members of the public in real-time so that any problems surrounding operations can be quickly dealt with and remediated as needed.

Whenever possible, Applicant purchases its products from companies whose packaging is compostable, or recyclable. With regard to the opaque packaging that Applicant provides at final sale of products, Applicant is committed to making such packaging as environmentally benign as possible while adhering to all requirements of Bureau of Cannabis Control Chapter 3, 5413.

Additionally, Applicant believes that service to the community surrounding its business is of the utmost importance. Applicant has a "Street Team" of employees that will be active in local neighborhoods. This Street Team will help to beautify the area surrounding 2074 Armory Drive, and the adjacent residential neighborhoods. Applicant plans to employ lower-income individuals and to invite local community volunteers to help with these Street Team cleanups.

Public Safety

Applicant is committed to increasing public safety in the communities where it operates through diligent hiring and training practices and improved lighting and security monitoring. All employees of Applicant will undergo full criminal background checks. Applicant's retail facility will be retrofitted with security cameras providing a continuous video feed consistent with all video surveillance provisions of Bureau of Cannabis Control Article 5 § 5044. It is Applicant's practice to install enhanced lighting to facilitate effective video monitoring of the facility and surrounding areas, so that any activity may be clearly captured by the security system and to discourage loitering or congregation.

Support of Local Commerce and Jobs

Applicant's local commitment also extends to the services that it purchases for its operations. It is Applicant's practice to use local security monitoring companies and equipment vendors. Applicant plans to use First Alarm in Santa Rosa and First Security, another locally owned business, for security and monitoring services.

Applicant maintains a local purchasing program in order to support manufacturers and cultivators within the local community. Applicant is committed to identifying and purchasing its products, as much as possible, from local licensed cannabis distributors who also conduct local purchasing programs.

It is Applicant's practice to employ local residents for positions on its operating staff, which further strengthens the local economy and tax base.

Staffing

Applicant plans to cover its work schedule with full-time employees who are eligible for full benefits as much as reasonably possible. Employees will be recruited from the local Santa Rosa and Sonoma County labor pool and Applicant will market its hiring campaigns in order to accomplish this goal. Starting hourly wage for employees will be approximately \$20, thus supporting Santa Rosa's commitment to the creation of head-of-household jobs and sustainable wages. In addition to the planned full-time employees, part-time employees will also be hired to ensure that all shifts are covered. Shifts will be between the hours of 8:00 A.M. to 10:00 P.M., seven (7) days per week.

Estimated Staffing Levels

As stated above, Applicant anticipates standard staffing at the start of operations will be eight (8) full-time and four (4) part-time employees who will arrive and leave daily for work shifts from the hours of 8:00 A.M. to 10:00 P.M. Shifts will be created to ensure that employees receive adequate rest breaks.

Employee Security

As a condition of employment, Applicant will require all potential employees to submit fingerprints to an approved Live Scan vendor and pass an electronic background check.

Employee Training and Education

All newly hired employees will receive comprehensive training. Staff training will be ongoing, and will cover topics including safety awareness, emergency procedures, inventory control, cannabis strains, and benefits, and any other job-specific requirements to ensure employees remain compliant with state and local laws regulations and have opportunities for ongoing professional success. Weekly employee training sessions will be conducted, which will cover a review of all security and emergency procedures, compliance with state and local laws and regulations, and address any training deficiencies or necessary clarifications.

Employee Transportation

Applicant recognizes that one of the "Transportation Goals and Policies" in Santa Rosa's General Plan is to "work with employers and business associations to meet employee transportation needs that will lead to reduction of the use of single occupant vehicles." As will be discussed in detail below, Applicant's facility backs up to a residential zone, is located very close to many bus stops, and has bicycle racks available. These many attributes allow employees to choose from walking, bicycling, or riding public transportation in order to get to Applicant's facility, which will further the City's goal of reducing the use of single occupant vehicles.

Attachments

Previously-submitted documents:

- Completeness Review Time Extension
- Conditional Use Permit Application
- Indemnification Agreement
- Copyright Materials Release
- Disclosure Form
- Storm Water Determination Worksheet
- Environmental Assessment
- Confidential Security Plan
- Business Plan and Resumes
- Vicinity and Neighborhood Context Maps
- Lighting Details
- Site Plans, Floor Plans, and Elevations

Newly submitted documents:

- Odor Control Plan Certified by Licensed Professional Engineer
- Vicinity Map Denoting Closest Schools
- View of Storefront Entrance from Public Right of Way
- Updated Site Plans, Floor Plans, and Elevations