

Exhibit B

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PLN160801-AMD1

APN: 107-051-002-000

145 Zabala Rd

Salinas, CA 93908

LAND USE PERMIT AMENDMENT



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INTRODUCTION: PURPOSE OF AMENDMENT

The primary objective of this amendment is to update the land use permit to allow for an increase in the total square footage of cultivation canopy. With the current approval the operation is only able to utilize approximately 66.8% of the existing greenhouse structures. The amendment is seeking to expand the canopy square footage to 220,000 square feet which would utilize approximately 95% of the existing greenhouse footprint.

It is crucial to emphasize that no new greenhouses are proposed to be constructed, and no substantial changes will occur, aside from optimizing the use of the existing greenhouse space. In essence, this amendment seeks to utilize our available space more efficiently without substantial changes, such as expanding lot coverage.

The increase in space utilization will be done by introducing a well known tool for greenhouse cultivation known as rolling benches. Rolling benches are specialized fixtures used in greenhouse and indoor cultivation settings. These benches are designed to move along tracks or rails installed within the greenhouse. The mobility of rolling benches allows growers to adjust the spacing between rows of plants as needed, effectively optimizing the use of available space. This improvement in efficiency allows the operations workforce to manage more canopy without needing to introduce additional employees. In addition the labor can better access all plants which improves the health of the crop and reduces the need for pesticides.

The property historically served as a location for the cultivation of cut flowers. During this previous use, operators were permitted to utilize the entire space within their greenhouses. Our request for this amendment is consistent with the historical use of the property and aims to align our current cannabis cultivation practices with past allowances. The occupancy and use of the greenhouse structures will not be changing due to this amendment.

It is important to note that any additional cultivation canopy resulting from this amendment will be fully licensed by the State of California and will have the necessary approvals from the Monterey County Cannabis Program. We are committed to upholding all relevant state and local laws, ensuring that our operations remain compliant and transparent.

In conclusion, this request for a land use permit amendment is aimed at optimizing our existing footprint without introducing major developmental changes.

D(1) Onsite Security Measures

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SECURITY PLAN

This is the written Security Plan for the property located at 145 Zabala Rd Salinas, CA 93908. This plan addresses the application requirements for 21.67.100 D(1) of the Monterey County code.

PHYSICAL SECURITY

The security at our facility will be designed to reduce the likelihood of security breaches and trigger an immediate response in the event of a breach. In addition, it will be designed to control access to the areas where cannabis is present, limiting access to authorized and properly identified personnel.

Location and Structure Specifications

The physical address of the property is 145 Zabala Rd Salinas, CA 93908 which is located within unincorporated Monterey County. The APN for the property is 107-051-002-000 and it is within the Farmland zoning district ("F").

The property has five existing greenhouse structures and two metal warehouses. For more detailed information on the location and size of structures please refer to the site plan.

Guards

Once the facility is operational we will employ security personnel to monitor site access. All security personnel will be thoroughly screened, trained, and strictly supervised by the to ensure they are of the highest capability.

Security personnel will perform and keep records of having performed routine regular inspections of all security systems, barriers, gates, doors, and locks, immediately reporting any malfunctioning or compromised security feature to the management team. Any incidents qualifying as irregular or suspicious will be handled immediately and documented appropriately.

Perimeter Security

Perimeter fencing is installed to secure the property and prevent unauthorized intrusion. The entire facility has a chain link fence and barbed wire at the top. The security of the perimeter fencing will be checked by guards daily.

During non-operational hours, all entryways and exits will be locked and closed by our gates to prevent access.

Access Conditions for Staff and Non-Staff Business Associates

After being cleared by security at the entrance, all staff and business associates will park in the common parking spots that are displayed on our parking plan. All staff will need keys to access the butler building, including restricted areas within the facility.

- Staff here refers to the following: a principal officer, board member, employee, or volunteer. Non-staff business associates are all those, such as vendors and contractors who do business with our Company but are not our staff. To access restricted areas of any part of the facility, non-staff business associates will need to be admitted by security and must be accompanied by a staff member at all times.

All persons working for or doing business with us will need a company-issued permanent identification card or temporary identification tag to be able to enter restricted areas. Staff will receive these upon hire.

Once the reason for their visit is confirmed, vendors and contractors will receive temporary identification tags at the entry gate before being allowed to enter the property under staff escort.

We will require that ID cards and tags be visibly worn by all staff and non-staff at all times within the facility.

Electronic Security System

We will install a comprehensive electronic security system with video surveillance/recording capability, third-party monitoring and intrusion detection.

Video Surveillance

We will install and maintain a video surveillance system capable of capturing and maintaining surveillance recordings of activity on the premises. We will maintain surveillance recordings for a period of at least ninety (90) days. The minimum resolution for the system will be 1280 x 720 pixels. All cameras are equipped with motion detection and will have infrared technology for low light conditions; capable of identifying activity at night or in unlit rooms.

Video surveillance will be installed to monitor the required licensed areas per §15044 of the Department of Cannabis Control regulations.

Alarm System

We shall install, maintain, and use a professionally monitored alarm system for the distribution premises as required by State law. This system will be monitored by a third party and the monitoring company will call management as soon as a breach has been detected. If management cannot be reached, the monitoring company will contact local law enforcement.

Alarm Testing

A test signal will be transmitted to the central station every twenty-four (24) hours. This will ensure the signal is constantly in working order. Finally, the system shall be inspected and all devices tested annually.

Maintenance and Testing

All security-related systems will be routinely inspected to ensure that they are functioning properly. This includes:

- Video surveillance equipment
- Alarm systems
- Electrical connections
- Information storage and backup systems
- Electrical backup systems

The Security Agent will be responsible for ensuring that such inspections take place at reasonable intervals. We will promptly implement all necessary repairs to ensure continuous proper functioning of the security system.

Policies and Procedures for Facility Security

Incident Management and Emergency Response

We understand that smooth operations require well-laid contingency plans and a staff well-trained in their execution. Under the leadership of our Security Agent and with input from appropriate local agencies and enforcement authorities, we will develop a comprehensive Emergency Response Plan.

The Emergency Response Plan will include contingencies for non-security related emergencies such as medical emergencies, fires, explosions, chemical release, and weather-related disasters to ensure an appropriate and orderly response. This will prevent non-security related emergencies from becoming aggravated security emergencies as well. Emergency procedures and emergency contact numbers will be provided in writing to all employees and posted prominently in all areas of the facility.

We will also develop a comprehensive set of guidelines for dealing with security threats. All staff will learn and be drilled in these procedures to ensure they are adequately prepared for emergencies. Preparedness means all staff members:

- Know how to assess emerging situations to determine the type and level of threat they may pose;
- Know how to respond to different kinds of security threats;

If a security breach is found to constitute an actual emergency, authorities will be notified as required. We will then follow the emergency response procedures in cooperation with local law enforcement authorities for smoothly bringing the situation under their control.

Procedures will be revised and updated as necessary. They will be reviewed at least once every twelve months. We will invite local law enforcement to offer their input on up-to-date security threat analysis and contingency planning.

Preventing Theft & Non-Diversion

To prevent diversion of cannabis we will take the following measures:

- Any personnel that commits theft or diversion will result in their immediate termination.
- Video surveillance will be present onsite and positioned in a way to comply with 7.90.100(A)(14)
- Cannabis that has been processed and awaiting sale will be stored in a secured room that has limited access.
- Only authorized individuals, whose information is recorded, will be allowed on the premises thereby reducing the threat of theft or diversion of cannabis.
- At the time of each purchase, we will verify the status of the State license to ensure it is active and valid.
- All cannabis activity will be entered into the METRC tracking system that follows every plant from seedling to sale to prevent shrinkage within the cultivation facility. Each plant has a barcode and if it is missing we will know that a serial number is unaccounted for;

Since regular inventory and supply chain tracking is crucial to preventing diversion, inventory will be maintained daily by a Track & Trace employee to verify the accuracy of our computerized inventory management system using METRC.

We believe that by having strict guidelines aimed at preventing diversion, and creating an inventory tracking system that allows us to follow each plant from seedling to sale, we will be able to create a closed loop system and effectively mitigate risks of theft and diversion.

Preventing On-Site Consumption

We shall not permit the consumption of cannabis within the premises in any form. Any cannabis or cannabis paraphernalia that shows evidence of the cannabis having been consumed or partially consumed will be reported to the County and/or Sheriff Department. We will routinely monitor surveillance to prevent the use of cannabis on the registered premises.

Incident Log

We will maintain an incident log with reports of incidents that triggered an alarm. Such reports shall be made available to the County during any inspection of the facility. We will notify the Cannabis Program and Sheriff Department by electronic means within twenty-four (24) hours of any incident in which a theft, burglary, robbery, or break in occurred, whether or not items were actually removed from the facility. Our facility manager shall follow up the initial notice with a written report describing in detail the factual circumstances surrounding the incident and include an inventory of all stolen items, if applicable. The incident log will be kept in a safe and secure filing cabinet as well as on Google Drive for a Digital Copy.

Suspicious Activity and Loitering

Staff will be trained to identify and respond appropriately to all levels of suspicious activity. Loitering will not be tolerated. Any person who is not working for the company or listed as a registered visitor for the day will be asked to leave. No one will enter the property without being verified to enter and checked in by security at the entrance.

OPERATIONS SECURITY

Making sure that our routine operations follow secure procedures is as important as physically securing each facility and having emergency response procedures in place. Consistent, proactive operational security policies and procedures greatly reduce the likelihood that emergencies will arise.

Workforce Security

Background Checks

We will perform background checks on all employees, volunteers, principals, directors, and board members. Copies of any public records obtained through the background check process will be provided to the individual concerned. To ensure transparency, the entire background checking process will be conducted by a third-party.

We will not employ anyone who does not pass a background check according to section 7.90.100(A.19) of the County Code.

Training and Drills

Security and emergency response training is only part of the comprehensive training required for all employees. Training will also cover:

- Cannabis laws and regulations,
- Procedures for plant maintenance,
- Procedures for product inventory management, and
- Personal safety, fire safety, and crime prevention.

All staff will also go through periodic refresher seminars, as well as new training on any policy updates or changes in procedure. All emergency procedures will be rehearsed in periodic drills.

In addition to training and periodic drills, all employees will receive official Company reference material, written in plain English (Spanish versions will also be available) and presented in an easy-to-use outline format, explaining all our operational, safety, and security policies and protocols.

We will also work with local police to develop effective ongoing employee training seminars and practices. Especially in developing our policies and training procedures on crime prevention and security threat response, we will seek the involvement of local law enforcement.

Personnel Records

We will maintain personnel records for each employee, agent, or volunteer that includes:

- Application,
- Documentation of all required training,
- A signed statement from the individual indicating the date, time, and place that he or she received training and the topics discussed, including the name and title of the presenters, and
- Records of any disciplinary action taken against employees at any time during employment.

These personnel records will be maintained for a period of at least six months past the end of the individual's affiliation with us.

Inventory and Cash Security

Limited Cash Operation

Cash payments will be directly deposited into a safe, keeping the cash located at one place in the facility. Access to the safe room will be limited to authorized personnel only. The cash will then be transported off site to limit the amount of money physically present. Cannabis banking has become much more prevalent than previous years, this operation will obtain a bank account to prevent large sums of cash from being present at the property.

Sale

The inventory tracking and control system associates every product sold with a single transaction, a single employee, and a single purchasing agent. All records of sales will be placed into our track and trace system, METRC.

Storage

All harvested cannabis will be stored in a limited access area inside of the processing building. This area will remain locked so only authorized personnel can access at any given time.

Inventory will be removed from the storage only for the purpose of immediate transport for sale. Transportation will be completed by a licensed distributor.

Visibility

Cannabis or paraphernalia will not be visible from any public or other property not owned by us.

Disposal of Cannabis

We intend to dispose of unwanted cannabis and its by-products by throwing it away into Waste Management receptacles which will remain secured on-site.

We shall report any stolen or lost cannabis by filing a police report with the Sheriff's Department, either in person or in writing immediately upon becoming aware of the theft or loss.

Record Keeping

We will keep meticulous records related to all activity involving cannabis onsite. Transport agents will carry with them a shipping manifest during transport of cannabis. All inventory control records such as harvest, waste, inventory transfer, transport, and delivery will be kept for seven years and made available to the County and authorities on request.

Information Systems Security

Securing Data

Our data and information are as valuable as our products. We will take special measures to protect our information systems and keep our data secure. These measures are:

- Using virus protection, spam-filtering, and firewalls
- Keeping software and OS updated
- Using passwords and changing them frequently
- Using secure wireless networks
- Restricting web browsing
- Initiating frequent and secure data backups

We will limit access to our network by using unique user passwords and by restricting IP addresses and MAC addresses to specific computers. The use of third party email, web, and data servers will be avoided. We will provide training on user security procedures.

- All data and information from our security system and from our inventory control system will be secured and encrypted and backed up automatically every night, not only to a private server on site, but also to a secure, off-site server location. Should there be an emergency, natural disaster, or criminal breach at our facility, all data remains safe and remotely accessible on our remote backup server.

- For data backup we will be uploading all data to our cloud server on a daily basis to ensure that we do not ever lose sensitive information pertaining to the operation of the cultivation facility.

Government Accessibility to Property & Records

The operator will allow access to the property and access to records if requested by the County, its officers, or agents, and shall pay for an annual inspection and submit to inspections from the County or its officers to verify compliance with all relevant rules, regulations, and condition

The applicant, owner, and permittees agree to submit to, and pay for, inspections of the operations and relevant records or documents necessary to determine compliance with this Chapter from any enforcement officer of the County or their designee.

The applicant for the cultivation and the owner shall indemnify, defend, and hold the County harmless from any and all claims and proceedings relating to the approval of the permit or relating to any damage to property or persons stemming from the commercial cannabis activity.

The owner shall be responsible for ensuring that all commercial cannabis activities at the site operate in good standing with all permits and licenses required by the Monterey County Code and state law.

The cultivation activities shall be maintained in accordance with the operating plans as approved by the County.

D(2) - STANDARD OPERATING PROCEDURES

Local & State Regulation Compliance

Operators will hire a full time Compliance Director who is responsible for ensuring the business maintains total compliance with local & State regulations. This position will focus on staying up-to-date with any changes to Monterey County ordinances and participating in any public hearings related to cannabis. They will also update the operations team on new or changing regulations to State law that would affect the procedures of the operation.

● **Distribution Compliance**

- Confirm units and/or weight of goods are accurately reflected in the track-and-trace system and shipping manifest (where applicable)
- Conduct R&D testing when needed
- **COA testing procedures**
 - When arranging for testing, licensee and/or employees will ensure cannabis goods batches are stored in compliance with Department Cannabis Control Regulations
 - Licensee will ensure that all cannabis goods batches are stored separately and distinctly from other cannabis goods and batches on the distributor's premises
 - Licensee will physically attach to each container of a batch stored for testing a label with:
 - (1) The name, license number, and licensed premises address of the licensed manufacturer or licensed cultivator who provided the batch;
 - (2) The date of entry into Licensee's storage area;
 - (3) the unique identifiers and batch number associated with the batch;
 - (4) A description of the cannabis goods with enough detail to easily identify the batch;
 - (5) the weight of or quantity of units in the batch; and
 - (6) the best-by, sell-by, or expiration date of the batch, if any;
 - Licensee will promptly contact a licensed testing laboratory and arrange for a laboratory employee to come to premises and select a representative of the batch
 - Licensee and/or employee will be physically present to observe testing laboratory employees obtain the sample of cannabis goods and ensure the increments are taken from throughout the batch.
 - Employees will not assist the laboratory employee nor touch the cannabis goods or sampling equipment.
 - Video monitoring will produce a sampling video with the batch number stated verbally or presented to the camera in writing at the

beginning of the video and a visible time and date indication will be on the video recording footage. These recordings will be maintained for 90 calendar days

- After the sample has been selected, both the licensee and the laboratory employee will sign and date the chain of custody form attesting to the sample selection having occurred and recording required batch information as well as sampling conditions and problems encountered, if any.
 - If the batch passes testing, the cannabis goods may be transported to one or more retailers or another licensed distributor.
 - If a batch fails testing and the batch can be remediated, the licensee may transport or arrange for the transportation of the batch to a licensed manufacturer for remediation.
 - Batches that fail laboratory testing and cannot be remediated will be destroyed.
- **Procedures prior to transfer for retail**
 - Licensee will conduct quality assurance review of goods before transferring and/or transporting for retail and verify the following:
 - Goods have not exceeded the sell-by or expiration date
 - The weight and/or count of the batch comports with what is in track-and-trace and on shipping manifest.
 - Packaging meets tamper-evident, child-resistant, and resealable packaging requirements.
 - Labeled with the statement “This package is not child-resistant after opening,” if applicable
 - Primary panel labeling, informational panel labeling, and packaging comply with the labeling requirements of Business and Professions Code and other applicable state regulations, including DCC Regs. See Labeling Requirement checklists (below), incorporated herein.
 - The certificate of analysis corresponds with the batch;
 - date on the certificate of analysis is less than 12 months old
 - labels on the cannabis goods are consistent with the certificate of analysis regarding cannabinoid content and contaminants required to be listed by law.
 - Licensee may package, re-package, label, and re-label cannabis including pre-rolls for retail sale.
 - If the goods are not labeled, or if a label is inaccurate, licensee may label the goods with the accurate amounts of cannabinoids, terpenoids, Total THC and/or Total CBD according to the certificate of analysis.

- Licensee will not package, re-package, label, or re-label manufactured cannabis products, except that licensee may label or re-label packages containing manufactured cannabis goods with the accurate amount of cannabinoids and terpenoids based on regulatory compliance test results.
 - Licensee will ensure that a copy of the certificate of analysis accompanies any batch to be transported and is provided to the licensee receiving the goods.
 - NOTE: Distributor may only transport untested immature cannabis plants and/or seeds to a licensed retailer or to the retailer portion of a licensed microbusiness.
 - NOTE: Distributor may transport untested cannabis goods to one or more licensed distributors, licensed manufacturers, licensed cultivators, and/or licensed microbusinesses authorized to engage in distribution, manufacturing, or cultivation.
- **Processing Compliance**
 - **The Harvesting & Drying Process**
 - Once a flowering plant has completed its Flowering Cycle, it is ready to be harvested or cut and hang dried. Harvesting is done in a temperature-controlled room with controlled humidity and adequate air circulation. It is important that the finished plants are not dried too quickly as this can affect the plant's smell and taste; but also that they do not dry too slowly as this can attract mildew and mold.
 - The finished plants are cut from their main branch and hung upside down on racks to dry out excess water weight. Each plant is placed at least four (4) feet above the ground and separated by a few inches. The plants are not vertically stacked on top of each other because that would impede the drying process and make the plants more susceptible to mold and mildew. After the plant is hung upside down the sun leaves that droop and cover the cannabis flowers are cut off.
 - **The Trimming Process**
 - After a hanging plant is fully dried it is ready to be trimmed. Trimming is done in a large sterile room full of ample lighting, tables and chairs. Trimming entails cutting off any remaining plant matter (leaves, stems, etc.) leaving the medical cannabis buds. Mostly hand instruments will be used for precision trimming. Automated machines are helpful for initial manicuring and can save time, but hand instruments are still necessary for quality detailed finish work.
 - **The Curing Process**

- The final step of the production process is Curing. The trimmed cannabis contained within the sealed curing bins is properly aerated to remove any remaining water. The lids of the curing bins are manually opened and closed, to slowly let out the remaining water weight and increase the flavor and aroma of the trimmed cannabis. The trimmed cannabis is rotated in the curing bin from time to time and turned over, to facilitate the curing process. The bins are opened and closed every 2-4 hours, typically, over the course of a week.

Product Quality and Safety
There will be no food preparation or sales on the site.

The best solution for controlling mold, disease, pests and heavy metals is not having them at all. Strict policy of prevention is the number one way to control the invasion of any harmful organisms. Many of these problems can be avoided by just maintaining appropriate growing conditions, requiring clean environment protocols, and through environmental design. This holistic approach can reduce or eliminate the conditions that these pests and contaminants need for sustainment.

- A successful preventative design includes:
- 1) Isolating Plants & Mitigation
 - 2) Systematic Pruning
 - 3) Introduction of Predator Species
 - 4) Selecting Pest & Disease Resistant Strains

Isolating Plants & Mitigation

Just as pests and contaminants can easily travel through humans and equipment, they can quickly spread across plants. That's why pests and contaminants often affect batches of plants at a time. When a single plant becomes affected, it's very easy for these problems to spread quickly to nearby plants. To combat this, Operators will inspect plants regularly to detect problems early on; and if a problem is found, quickly work to quarantine the plant inside of our mitigation department. The mitigation department is an enclosed area that isolates compromised plants from the rest of the population. If the plant can be remediated or recovered, it is placed back into the production area it came from. If it cannot be corrected the plant will be recycled for compost. In the event that a plant is removed for mitigation, staff will be instructed to closely monitor other plants in the same lot to make sure the same problems do not occur.

Systematic Pruning

Yeast, mold, and bacteria require: water, a suitable temperature, and

substrate to thrive. Decaying plant matter is an ideal substrate. Decaying plant matter provides food and shelter for many unwanted pests, as well as an area for them to breed. Systematic pruning of plants and removal of any plant material from trays, reservoirs, and surrounding work areas will prevent onset and spread of pests and microbiological contaminants.

Introduction of Predator Species

Use of predator species to control unwanted pests (known as Biological Pest Control) is an effective means of pest control that does not require the use of harmful chemicals. Ladybugs for example, and in particular their larvae, are voracious predators of aphids, mites, scale insects and small caterpillars. Various other insects and predatory mites feed on spider mites and provide a high level of natural control as well. Operators will implement these biological controls to naturally prevent the onset and spread of unwanted pests in the proposed facility, thereby minimizing the need for chemical pesticides.

Selecting Pest & Disease Resistant Strains

A part of Operators's Strain Development & Breeding Program will be to develop new Medicinal Varieties and modify existing strains for desired traits. Through selective breeding, Operators can increase desired traits into a cultivator and reduce the chances of undesired traits. One of these desirable characteristics in a strain is pest and disease resistance. Operators will utilize such strains to minimize the onset and spread of pests in the proposed facility.

Laboratory Testing

Operators will only work with licensed cannabis testing labs to ensure that all products pass the required testing prior to entering the commercial market.

Cannabinoid Profiling

Cannabinoid profiling informs patients about the concentration of active cannabinoids in their medicine. Researchers have identified over 70 cannabinoid compounds, many of which possess distinct medicinal benefits. This table provides an overview of the most common cannabinoid compounds and their pharmacological effects. You can see that while THC is the most well-known cannabinoid, it is only responsible for a fraction of cannabis' medicinal benefits. For this reason, we also test for CBD, CBDA, CBN, and THCA.

Pesticide Testing

Pesticide testing will be done to detect trace amounts of chemical pesticides in dried flowers and cannabis concentrates. Testing will be performed to ensure there are no pesticides present in the cannabis in amounts not allowed per California regulations.

Microbiological

Screening

Microbiological testing will be done to detect any amounts of molds and mildews in cannabis products. Testing will be performed to ensure there are no molds or mildews present in the cannabis in amounts not allowed per California regulations.

Record Keeping

Financial Records: All sales will be recorded through the track & trace system which will also act as point of sale software. Records of company expenses will be recorded via accounting software such as QuickBooks.

Testing: cultivation may occasionally get R&D (research and development) testing performed to see how certain cannabis strains perform. Compliance testing will only be done by an operator's distribution license or an outside distribution company. Operators will keep a record of all test results on the cloud.

Product Recall

Once a batch sample is submitted to the Testing Lab, Operators will store the remaining batch on-site until the test results have been completed. If for any reason, the test results come back positive for pesticides or mold at unsafe levels, a product recall will be necessary.

If the test results indicate there are pesticides present then Operators will take the batch that was tested and dispose of it according to our waste management procedures for all cannabis material. Operators will take a note of the quantity and specific batch number by inputting this record into our track and trace system.

If the test results indicate there is mold present at an unsafe level, Operators will first seek to work with a permitted manufacturer to have a portion of the batch processed into concentrate. During the extraction process it is common for mold spores to remain in the plant material and not be transferred into the concentrated byproduct. Of course once the extraction is complete and before the final product is ever sent to a dispensary the extraction will be tested to ensure no harmful molds are present. Should the extraction process eliminate the mold that was present in the batch, the concentrated product will move on in the supply chain. If, for any reason, the extraction process is unsuccessful in eliminating the safety concerns, a product recall will be implemented. All cannabis from the original batch will be disposed of according to our waste management procedures. Operators will take note of batch number and quantity being disposed of by inputting a record into our track and trace system.

D(3) - HOURS OF OPERATION

The proposed hours of operation are 8:00am to 5:00pm Monday - Friday. A farming operation has unexpected events related to the care of the plants being grown. There may be times the operation requires immediate attention outside of the business hours listed.

D(4) - WASTE DISPOSAL INFORMATION

Cannabis waste will be disposed of in a designated waste receptacle on the property. Physical access to the receptacle or area is restricted to only the licensee, employees of the licensee, the local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by the local agency. Public access to the designated receptacle or area will be strictly prohibited.

Elizabeth Hall of Monterey County Waste Management has been consulted to order the appropriate sized waste receptacles once cannabis operations begin.

The track-and-trace system will be used to document the cannabis waste by identifying, weighing, and tracking when disposed of.

Any other waste that is not deemed cannabis waste will be disposed of in a separate receptacle that will be designated for regular garbage. Recyclables will also have their own designated container, separate from cannabis waste. MCWM will be contracted for these garbage containers as well.

D(5) - WATER MANAGEMENT PLAN

Water Sources

The property has an on-site well which will be used for all of the watering needs of the cannabis operation. The well can produce hundreds of gallons per minute which is more than enough for our facility. This will ensure that our facility is self-sufficient because we will only use the water from our own well and not need any outside resources.

Water Conservation Irrigation

The operation will be using a pulse watering technique which is an improved method of spaghetti tube irrigation. Instead of watering plants once or twice a day with a large amount of water, plants are watered more frequently with small amounts of water. This allows the water to be redistributed within the pots between waterings, resulting in a more uniform water distribution within the pots. That makes it possible to thoroughly wet the growing medium with minimal irrigation run-off.

Our pulse watering systems will be designed more carefully than regular spaghetti tubing. In regular spaghetti tube systems, it is not uncommon that tubes on one end of a bench start dripping 10-15 seconds before tubes at the other end emit water. This may not be significant if the plants are watered for several minutes. However, with pulse irrigation, plants are watered multiple times per day for short periods and the system layout is designed so that all pots receive similar amounts of water.

By using pulse irrigation we will be able to have minimal water run-off because the plants will never be overwatered.

Rolling Benches

Rolling benches will be installed which will significantly improve water management by offering several advantages:

1. Uniform Water Distribution: The mobility of rolling benches allows growers to adjust the spacing between rows of plants easily. This flexibility ensures that all plants receive an equal share of water, maintaining uniformity in water distribution across the entire greenhouse. It's especially valuable in large or irregularly shaped greenhouses where some areas may receive less water than others.
2. Reduced Water Runoff: Rolling benches will be designed with drainage systems that collect and recirculate excess runoff water. This reduces water waste and prevents environmental contamination that can occur when runoff carries nutrients or pesticides into the surrounding environment.

3. Effective Drainage: Rolling benches can be adjusted to create slight slopes or gradients in the greenhouse. This facilitates natural water flow toward drainage systems or designated collection points. Proper drainage prevents water from pooling around plant roots, reducing the risk of root rot and other water-related issues.
4. Minimized Evaporation: Rolling benches elevate plants above the ground, reducing direct contact between plant containers and the soil or greenhouse floor. This minimizes evaporation from the soil surface, ensuring that more water is available for plant uptake.
5. Water Recycling: Rolling bench systems can be designed to capture and recycle excess irrigation water and runoff. Collected water can be filtered and treated before being reused, reducing the overall water consumption of the operation and promoting sustainable water use practices.
6. Pest and Disease Control: By reducing standing water and maintaining drier conditions in the greenhouse, rolling benches discourage the proliferation of mold, fungi, and insects that thrive in damp environments. This can lead to a reduced need for pesticide applications and a healthier plant environment.

In summary, rolling benches in a greenhouse offer a versatile and efficient platform for plant growth that significantly improves water management. Their precise irrigation, drainage capabilities, and adaptability help optimize water use, reduce waste, and promote sustainable and environmentally responsible cultivation practices.

D(6) - YOUTH ACCESS RESTRICTION

All visitors will be verified before being allowed on-site. Our gate will be monitored and our security personnel will ask for government identification of all visitors. Security will ensure that all visitors are at least 21 years of age by verifying their birthdate on the government issued identification.

Anyone that is found to be younger than 21 years old will not be granted access onto the property.

D(7) - PRODUCT SUPPLY CHAIN

Where Cultivation Occurs

Cultivation will take place within the existing greenhouse structures on the property.

Where the Product is Processed

Processing will take place within the two proposed metal buildings on the property. Drying, trimming and storing of cannabis are the activities that will take place within the buildings.

Required Testing of Cannabis or Cannabis Products

California regulations provide that compliance testing must be completed by a licensed distribution license. Cultivators are allowed to perform R&D tests however those tests do not qualify the cannabis or cannabis products to go to market. Most of the cannabis or cannabis products will be sold to licensed distributors who will be responsible for getting the testing lab to sample material.

If we decide to transfer the product to our own distribution license, we will follow all testing requirements outlined in the regulations:

- Cannabinoids and terpenes
- Residual solvents and processing chemicals
- Residual pesticides
- Heavy metals
- Microbial impurities
- Mycotoxins
- Moisture content and water activity
- Foreign material

Transportation

Cannabis can only be transported by licensed distributors or transport only companies. If selling a product to a licensed distributor we will ensure the product is transported compliantly. One of two things will happen, either the distributor will come pick up the product from our facility or we will transport it ourselves with our distribution license.

All transportation will be recorded via shipping manifests which will list:

- Name, license number, and premises address for:
 - The licensee who possesses the cannabis goods
 - The licensee transporting the cannabis goods

- The licensee receiving the cannabis goods
- Name and license number of any licensee involved in the activity or transaction who is not shipping, transporting, or receiving the cannabis goods
- Date and time of activity
- Date and time of departure from first premises, and estimated time of departure for subsequent premises if cannabis goods are being shipped from multiple premises in one transport vehicle
- Estimated date and time of arrival at each receiving premises
- Driver license number for any person driving the transport vehicle
- Make, model, and license plate number of transport vehicles
- Name and type of cannabis goods to be transported

Upon receipt, the receiving licensee shall ensure the cannabis goods received are as described in the shipping manifest and accept the cannabis goods in the track and trace system. If there is a discrepancy between the cannabis goods received and the shipping manifest, the receiving licensee shall document the discrepancy in the track and trace system and any other relevant business records.

If the facility performs transportation via a distribution license, alternative fuel vehicles will be utilized as required by Monterey County Code section 21.67. Initial plans do not include making deliveries from the site. Using the operators distribution license will only be used to move cannabis from greenhouses to processing buildings. This does not require the use of motor vehicles.

Packaging & Labeling Criteria

All packaging & labeling of cannabis and cannabis products will follow all DCC regulations. DCC is responsible for establishing statewide standards for packaging and labeling of cannabis and cannabis products. In addition to DCC regulations, The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) includes basic requirements for how cannabis and cannabis products must be packaged before sale.

The specific criteria we will follow is outlined on the following pages. These are documents provided directly from DCC which include packaging checklists, labeling checklists for cannabis (for flower and flower-only pre-rolls) and labeling checklists for cannabis products (for manufactured cannabis products such as edibles, concentrates, and topicals).

C h e c k l i s t

Packaging Requirements: Final Form Cannabis Goods

The Medicinal and Adult-Use Cannabis Regulation and Safety Act ([MAUCRSA](#)) includes basic requirements for how cannabis goods must be packaged before retail sale. These guidelines apply to all nonmanufactured and manufactured cannabis goods that will be sold at a licensed retailer.

Packaging Checklist

- **Tamper Evident** – A consumer can tell if the package has been opened.
Examples: a plastic seal, a sticker across the lid that is ripped when opened, or a jar with a lid that pops up after opening.
- **Child-resistant** – The package is designed to be difficult for children under five years of age to open. See “Child-resistant Packaging Guidelines” for more information about what qualifies as child-resistant.
- **Resealable (for packages that contain more than one serving)** – The package can be closed after each use.
Examples: a lid, adhesive closure, or box top closure.
- **Opaque (for edibles only)*** – The package is not transparent; consumers cannot see the product through the packaging.
**Colored bottles are considered opaque, provided that the bottle obscures the color of the liquid inside.*
**Opaque bottles used for beverages may use a single, vertical, clear strip less than 0.25” wide to indicate serving sizes.*

DOs

- Protect products from contamination and exposure to any toxic or harmful substances.
- Use any layer of packaging, to meet the packaging requirements listed above.

DON'Ts

- Cannot imitate packaging used for products typically marketed to children.

The Department of Cannabis Control (DCC) licenses and regulates commercial cannabis activity within California. To learn more about the California cannabis market, state licenses or laws, visit cannabis.ca.gov. Email questions to info@cannabis.ca.gov or call 1-844-61-CA-DCC (1-844-612-2322).



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C h e c k l i s t

Child-resistant Packaging (CRP)

State law requires that all cannabis goods are sold in child-resistant packaging (CRP). CRP is packaging that is designed to be hard for children under five years of age to open. It is the responsibility of the licensee that packaged the cannabis good to make sure that the package meets CRP requirements.

There are three types of packaging that qualify as child-resistant:

- Packages that have been certified as child-resistant under the requirements of the [Poison Prevention Packaging Act](#) (PPPA, 16 CFR 1700.15(b)(1)). To meet this standard, packaging must be tested and certified as meeting the PPPA standards. You can ask your packaging supplier if the packaging you are considering has PPPA-compliant certification.
- A bottle sealed with a pry-off metal crown cork-style bottle cap (for packages containing only a single serving).
- Plastic packaging that is at least 4 mils thick and heat-sealed without an easy-open tab, dimple, corner, or flap (for packages of cannabis goods that qualify for single-use CRP or that contain only a single serving).

Types of child-resistant packaging:

- **Single Use (“Initial CRP”)** – the package is initially child-resistant, but once opened, it is no longer child-resistant. If used, the package’s label must say “This package is not child-resistant after opening.”
- **Multiple Use (“Lifetime CRP”)** – the package maintains its child-resistance throughout the life of the package. It can be opened and closed, but still remains child-resistant.

What type of child-resistant packaging does my product require?

Single-use CRP

- Cannabis Flower
- Pre-rolls
- Topicals
- Dab, Shatter, Wax
- Vape Cartridges

Note: Package must be labeled with the statement “This package is not child-resistant after opening.”



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Multiple-use CRP

- Edibles
- Orally-consumed concentrates, such as tinctures or capsules
- Suppositories

Note: *A package that contains more than a single serving is not required to be child-resistant if each individual serving is packaged in child-resistant packaging.*

More information about CRP requirements for cannabis and cannabis products can be found in Department regulations section [17412](#).

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C h e c k l i s t

Labeling Requirements: Non-manufactured Products in Final Form

Cannabis must be properly labeled to make sure consumers are informed about what they are buying and to prevent unintended use. These guidelines cover labeling requirements for non-manufactured cannabis goods that are ready to be sold by a licensed retailer.

Labeling placement Where does the required labeling go?

Most of the required labeling must be placed on the outer layer of packaging or be easily visible through the outer layer of packaging (for example, if the outer-most layer is a clear cellophane wrapper). The outer labeling requirements are divided into two categories, based on the part of the package where it belongs.

- Primary Panel – The part of the label most likely to be displayed to the consumer at retail; usually the front or top of the package
- Informational Panel – Any other part of the label that is not the primary panel

If the product is packaged in a way that the immediate container holding the cannabis good can be separated from the outer packaging (such as a jar placed inside of a box), the immediate container must be labeled with the universal symbol.

Labeling dos

- Display information clearly and legibly
- Use English
- Use at least 6-point font
- Make sure all labeling information is shown on the outer layer of packaging
- Additional product information may be added as long as it is truthful and not misleading

Labeling don'ts

- Don't use California city or county names —The name of a California city or county can only be used on the label if 100% of the cannabis is grown there.
- Don't make the label attractive to children — This includes using cartoons, images popularly used to advertise to children, imitating candy labeling, and using the words “candy,” “candies” or a variation, such as “kandy” or “kandeez,” anywhere on the label.
- Don't include false or misleading information — This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression.



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- Don't make unproven health claims — Health-related statements, such as claims about a product's ability to treat or cure disease, may not be made unless there is significant scientific agreement and the claims are supported by a totality of publicly-available peer-reviewed evidence. Anecdotal information and preliminary study results do not meet these criteria. *Note: Health-related statements are heavily regulated by the FDA, and cannabis businesses are not exempt from federal prosecution for misleading health statements.*
- Don't indicate that the cannabis is organic. This includes using the word "organic" or any variations, such as "organix".
- Don't make any claims that the cannabis is "OCal" unless the cannabis meets the standards set in Business and Professions Code §26062.

Labeling checklist (for outer layer of packaging)

Primary panel — The part of the label displayed to consumers at retail; usually the front or top of the package

- Product Identity — A generic or common name that describes the item. Examples include flower or pre-roll.
- Net weight of the cannabis in the package — List weight in both metric and U.S. customary units. (Example: NET WT. 4.0 oz. (113.4 g))
- Universal Symbol (in black, at least 0.5" X 0.5") — The California symbol that identifies cannabis and cannabis products. *Note: The symbol can be downloaded at www.cannabis.ca.gov*

Informational panel — any part of the label that is not the primary panel

- UID number — The unique tracking number issued through the track and trace system
- Licensee name and phone number or website — The licensee name can be either the name of the licensed cultivator or licensee packaging the product and must be a name listed on the license certificate (either the legal business name or the registered DBA)
- Date of packaging for retail sale — Include month, day and year
- Government warning statement (in capital and bold letters)

Cannabinoid content labeling — May be on either the primary or informational panel and can be placed on the label before releasing to distribution or by the distributor on the licensed distribution premises after issuance of a regulatory compliance testing Certificate of Analysis for the batch.

Labeled before testing:

- Total THC expressed as a percentage (*Total THC is the sum of THC and THCA. For information on how to calculate Total THC, see DCC regulations section 15700(rrr)*)



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Labeled after testing:

- Total THC expressed as a percentage
- Any cannabinoid that is 5% or more of the cannabinoid content

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D(8) - RECORD KEEPING POLICY

The cannabis operation will maintain all the following records either electronically or otherwise on the licensed premises, including but not limited to:

1. All permits, licenses, and other authorizations to conduct the licensee's commercial cannabis activity;
2. All supporting documentation for data or information entered into the track-and-trace system;
3. All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system must be retained for six (6) months after the date the tags were retired;
4. Financial records related to the licensed commercial cannabis activity, including but not limited to contracts, purchase orders, sales invoices, and sales receipts;
5. Personnel records, including each employee's full name, social security number or individual taxpayer identification number, date of beginning employment, and, if applicable, the date of termination of employment;
6. Records related to employee training for the track-and-trace system or other requirements of this chapter. Records shall include, but are not limited to, the date(s) training occurred, description of the training provided, and the names of the employees that received the training;
7. Contracts with other state licensed cannabis businesses;
8. Records associated with composting or disposal of cannabis waste;
9. Documentation associated with loss of access to the track-and-trace system;

All required records shall be prepared and retained in accordance with the following conditions:

1. Records shall be legible; and
2. Records shall be stored in a secured area where the records are protected from debris, moisture, contamination, hazardous waste, fire, and theft.

D(9) - TRACK & TRACE MEASURES

California has selected METRC as the state's track-and-trace system used to track commercial cannabis activity and movement across the distribution chain ("seed-to-sale"). All licensed cannabis operations on the property will be required to use METRC ("the track-and-trace system") for recording all applicable commercial cannabis activities.

The cannabis operation will identify an owner in the licensee's organization to be the licensee's track-and-trace system account manager. The licensee's designated track-and-trace system account manager will be responsible for all the following:

1. Complete track-and-trace system training provided by METRC.
2. Designate track-and-trace system users, as needed, and require the users to be trained in the proper and lawful use of the track-and-trace system before the users are permitted to access the track-and-trace system;
3. Maintain an accurate and complete list of all track-and-trace system users and update the list immediately when changes occur;
4. Within three (3) calendar days, cancel the access rights of any track-and-trace user from the licensee's track-and-trace system account if that individual is no longer authorized to use the licensee's track-and-trace system account;
5. Correct any data that is entered into the track-and-trace system in error within three (3) calendar days of discovery of the error; and
6. Notify the department immediately for any loss of access that exceeds three (3) calendar days.

If the cannabis operation loses access to the track-and-trace system for any reason, the licensee will prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access.

1. Once access to the track-and-trace system is restored, all inventory tracking activities that occurred during the loss of access will be entered into the track-and-trace system within three (3) calendar days.
2. A licensee will document the date and time when access to the track-and-trace system was lost, when it was restored, and the cause for each loss of access.
3. A licensee will not transfer cannabis or non manufactured cannabis products to a distributor until such time as access to the system is restored and all information is recorded into the track-and-trace system.

Unique Identifiers (UID)

The cannabis operation will only use UIDs provisioned and distributed by the DCC. The licensee will maintain a sufficient supply of UIDs in inventory to support tagging in accordance with this section. All cannabis will be entered into the track-and-trace system by the licensee starting with seed, cannabis which has been propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery.

The UID will accompany the cannabis products through all phases of the growing cycle, as follows:

1. Licensees with immature plants will assign a UID to each established lot respectively. The lot UID will be placed in a position so it is visible and within clear view of an individual standing next to the immature lot to which the UID was assigned, and all UIDs will be kept free from dirt and debris. Each lot of immature plants will be uniform in strain or cultivar and will not have more than one hundred (100) immature plants at any one time. All immature plants in a lot will be labeled with the corresponding UID number assigned to the lot and will be contiguous to one another to facilitate identification by the department.
2. Each immature plant intended for retail sale will have a UID affixed, or be labeled with the corresponding UID number of the lot, and be recorded in the track-and-trace system prior to transfer from the licensed nursery.
3. The licensee will apply a UID to all individual plants at the time any plant is moved to the designated canopy area or when an individual plant begins flowering.
4. UIDs are required for each mature plant. UIDs will be attached to the main stem, at the base of each plant. The UID will be attached to the plant using a tamper evident strap or zip tie and placed in a position so it is visible and within clear view of an individual standing next to the mature plant to which the UID was assigned and UIDs will be kept free from dirt and debris. Licensees are prohibited from removing the UID from the mature plant to which it was attached and assigned until the plant is harvested, destroyed, or disposed of.

Each harvest batch will be assigned a unique harvest batch name which will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.

UIDs are required for all cannabis and non manufactured cannabis products and will be associated with the corresponding harvest batch name from which the cannabis and non manufactured cannabis products were derived.

Upon destruction or disposal of any cannabis or non manufactured cannabis products, the applicable UIDs will be retired in the track-and-trace system by the licensee within

three (3) calendar days of the destruction or disposal and be performed in accordance with the licensee's approved cannabis waste management plan.

Track & Trace Reporting

The track-and-trace account manager or users will report in the track-and-trace system any and all transfers of cannabis or non manufactured cannabis products to another licensee prior to the movement of the cannabis or non manufactured cannabis products off the licensed premises.

The track-and-trace account manager or users will report in the track-and-trace system any and all cannabis or non manufactured cannabis products physically received or rejected from another licensee within twenty-four (24) hours of receipt or rejection of the products.

The track-and-trace account manager or users will report in the track-and-trace system information related to the disposition of cannabis and non manufactured cannabis products, as applicable, on the licensed premises. All applicable information for each event listed below will be reported in the track-and-trace system within three (3) calendar days of the applicable event.

- (1) Creating a planting of an immature plant lot;
- (2) Moving immature plants to a designated canopy area, or when an individual plant begins flowering, or when applying a UID to an immature plant, in accordance with section 8403(b)(3) of this chapter;
- (3) Destruction or disposal of an immature or mature plant;
- (4) Harvest of a mature plant, or portion thereof. The following information must be reported into the track-and-trace system for each harvested plant, or portion thereof, or harvest batch:
 - (A) The wet weight of each harvested plant, or portion thereof, which must be obtained by the licensee immediately after harvest of the plant, or portion thereof;
 - (B) The net weight of each harvest batch
 - (C) The weight of cannabis waste associated with each harvest batch;
 - (D) The unique name of the harvest batch and the initiating date of the harvest. For the purposes of this section, the initiating date of the harvest is the month, day, and year the first mature cannabis plant(s) in the harvest batch were cut, picked, or removed from the soil or other growing media. The initiating date of the harvest will be recorded using the MM/DD/YYYY format. For example, January 1, 2018 would be recorded as 01/01/2018.

(5) Packaging.

The account manager or user will report information in the track-and-trace system for each transfer of cannabis or nonmanufactured cannabis products to, or cannabis or nonmanufactured cannabis products received from, another licensee. Required information to be entered includes, but is not limited to:

- (6) Name, business address, and department or other licensing authority issued license number of the seller;
- (7) Name, business address, and department or other licensing authority issued license number of the purchaser;
- (8) Name and department issued license number of the distributor;
- (9) Date of sale, transfer, or receipt (month, day, and year) of cannabis or nonmanufactured cannabis products;
- (10) Weight or count of individual units of cannabis or nonmanufactured cannabis products sold, transferred, or received;
 - (A) Weight. For the purposes of this section a licensee must use wet weight or net weight. Wet weight and net weight will be determined following weighing device requirements pursuant to section 8213 of this chapter and measured, recorded, and reported in U.S. customary units (e.g., ounce or pound) or International System of Units (e.g., kilograms, grams, or milligrams).
 - (B) Count. For the purposes of this section, "count" means the numerical count of the individual plants or units.
- (11) Estimated departure and arrival time;
- (12) Actual departure time;
- (13) Description for each item, including strain or cultivar, and all of the applicable information below:
 - (A) Plant;
 - (B) Flower;
 - (C) Leaf;
 - (D) Shake;
 - (E) Kief; and
 - (F) Pre-rolls.
- (14) UID(s).

Track & Trace Inventory Activities

The cannabis operation will use the track-and-trace system for all inventory tracking activities at a licensed premises, including, but not limited to, all of the following:

- (a) Reconciling all on-premises and in-transit cannabis or nonmanufactured cannabis products inventories at least once every thirty (30) calendar days; and
- (b) Recording the net weight of all harvested cannabis once the majority of drying, trimming, and curing activities have been completed, or within sixty (60) calendar days from the initial harvest date, whichever is sooner;
- (c) Licensees shall close out their physical inventory of all cannabis and nonmanufactured cannabis product and UIDs, if applicable, prior to the effective date of any of the following changes to their license:
 - (1) Voluntary surrender of a temporary license or annual license;
 - (2) Expiration of an annual license;
 - (3) Revocation of a license.
- (d) Close-out of physical inventory includes, but is not limited to, all of the following items:
 - (1) Immature plants and their corresponding lot UID(s);
 - (2) Mature plants and their corresponding plant UID(s);
 - (3) Harvest batches and their corresponding UID(s);
 - (4) Nonmanufactured cannabis products and their corresponding UID(s); and
 - (5) UIDs in the licensee's possession which have not been assigned in the track-and-trace system.
- (e) All transfers and sales shall be documented pursuant to sections 8401 and 8405 of this chapter.

D(10) - SUSTAINABILITY MEASURES

1. Water Efficiency Measures: please see water management plan
2. Energy Efficiency Measures: Several measures will be taken to increase the energy efficiency of the greenhouse operation. The following steps will be taken to increase the energy efficiency of the operation:

- a. The greenhouses were extremely "leaky", meaning that they have cracks, holes, and openings in the walls or roof that allow cold air to leak into the house and warm air to escape. This "infiltration" can account for a significant portion of a greenhouse's winter heating bill. We will eliminate all holes, openings and cracks in the greenhouses. This measure can often reduce your heating bill by 5% to 10%. Tightening up the house has the added benefit of improving control over airflow patterns in the house, which can make temperatures and humidity levels more uniform.

Metal posts and frames that are embedded in a greenhouse's walls or roof are another spot where heat can leak out. Even though there is not a physical opening to allow hot air to escape, the metal, with its high thermal conductivity, provides an easy "pathway" for heat to move from indoors to out. We will cover these structural elements with insulation whenever practical.

- b. Adding thermal screens: greenhouse coverings are clear in order to allow sunlight into the house. Unfortunately, clear panels are also poor insulators. We will minimize nighttime heat loss in the winter by using a movable thermal screen that can be drawn across the roof and walls of the greenhouse. Often these thermal screens can serve double duty - providing shade from excessive sunlight in midsummer, and providing thermal insulation during winter nights. The reduction in heating costs will vary but can be as high as 30% or 40%.
- c. Seal the fans: When ventilation fans are turned off, the fan's louver will automatically close the fan opening. At least that's how it's supposed to work. Unfortunately, bent or malfunctioning louvers are all too common in greenhouses, as well as drilled holes or gaps around the fan housing. This leads to air leakage during the winter, which translates into higher heating bills. Malfunctioning louvers will be identified and repaired or replaced. We will also cover the fan inlet with a sheet of foam insulation board during the

coldest months when the fan is not needed.

- d. Installing rolling benches will improve energy efficiency in several ways. Rolling benches will help optimize the layout of greenhouse infrastructure. By minimizing unused space and accommodating more plants within the same area, growers may require fewer greenhouse structures overall. This can lead to reduced construction and maintenance costs and lower energy demands for heating and cooling. By concentrating plants closer together during cold seasons, growers can reduce the heating load and conserve energy while maintaining suitable temperatures for plant growth. Also, the grow lights won't have "blank spots," which are places where the light hits but there is no plant canopy. This wastes energy because light that hits the floor or walls doesn't produce anything.
3. High Efficiency Mechanical Systems: We are constantly looking to improve its greenhouse operation by maintaining and/or adding high efficiency mechanical systems. Below are steps we've taken for our greenhouse operation:

- a. All of the greenhouses had very old and inefficient ventilation fans. We will replace ventilation fans with high efficiency models.

We regularly maintain all fans in the greenhouse by cleaning them on a quarterly basis. Accumulated dust on a fan's blades and safety screen can increase ventilation energy use by as much as 20%. All that is needed to correct this problem is a rag and some elbow grease. We will deactivate the electrical circuit for the fan before starting, just to be safe.

- b. We will utilize high efficiency mechanical thermostats and regularly check to make sure everything is running properly. A thorough inspection of the control system requires a bit of technical knowledge about the controls equipment which is done twice per year. However, the greenhouse manager can catch simple problems by simple observation. For example, if the ventilation fans are on while the heat is on, there's probably something wrong. If the lights are on in a greenhouse when there are no plants in the house, it's worth it to figure out why and correct the problem.
4. Alternative Fuel Transportation Methods: We will work with several licensed distribution companies to transport products throughout the State. In choosing a provider, distributors who use alternative fuel and hybrid vehicles will be a

deciding factor on who gains our business. If the facility ever elects to perform self-distribution alternative fuel vehicles will be used.

D(11) - ODOR PREVENTION DEVICES

Odor prevention devices and techniques, such as a ventilation system with a carbon filter, will be incorporated to ensure that odors from cannabis offsite.

Other odor prevention devices will be considered, such as misting systems. Greenhouse exhaust fans are fitted with a ring of nozzles that atomize liquids under high-pressure into billions of micro-fine water droplets (or fog). The system injects a highly concentrated (1:1000) mixture of odor-neutralizer into the water fog before dispersing into the air. The droplets' small size (1/10th the diameter of a human hair) creates more surface area which speeds evaporation, instantly releasing the odor-neutralizing product that traps airborne odors and bio-degrades the unpleasant smell.

Prior to the issuance of the commercial cannabis business permit, specific Odor Control devices will be chosen and submitted for review to the Cannabis Program. Odor prevention devices will be maintained in good working order during the life of the operation.

D(12) - PROPOSED SIGNAGE

There will be no signage on site or visible from the public that displays or infers anything related to cannabis.

The site will have 12" x 12" signs that label the greenhouse & building addresses. The signs will have white background with black lettering and will also be reflective.

The only other signage that will be visible from the public would be the address numbers for the property.

D(13) - PARKING PLAN

There are 41 unpaved parking spaces on the property.

Please see our site map to visually see location and quantity of parking spaces.

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