



City of Sebastopol Planning Commission Staff Report

Meeting Date: March 8th, 2022
Agenda Item: 6A
To: Planning Commission
From: John Jay, Associate Planner
Subject: Conditional Use Permit – Cannabis Distribution
Recommendation: Approve with conditions

Applicant/Owner: Andrew Longman
File Number: 2021-070
Address: 400 Morris St. Suite A & J
CEQA Status: Exempt
General Plan: Light Industrial
Zoning: Industrial

Introduction:

The project is a request for the modification of Suite A and J so that the applicant can move Seed to Leaf products freely throughout the facility along with their external network. A Cannabis Distribution use permit from the city pertains to wholesale distribution only and does not include any retail sales.

Project Description:

This Conditional Use Permit would allow Seed to Leaf the opportunity to control the safety and quality of its own distribution network. The distribution portion of the project is proposed to be small in scale, accounting for 172 square feet of the 5,970 square feet of the building. Within that space the product will be tracked and stored according to state protocols.

Project Location and Surrounding Land Uses:

400 Morris Street is located on the northeast side of Sebastopol within the Industrial zoned area of the city. The surrounding buildings are industrial in use both to the north and south of the project site. To the east is open space and the Laguna De Santa Rosa Preserve and to the west is a mix of Single Family and Multifamily residential. The project site is located near two high schools and youth community centers. However, since the project does not include cannabis retail the 600' school setback, per section 17.360.100, does not apply for this project.

General Plan Consistency:

This project is consistent with the General Plan policy EV1-11 *“Work with and support local business organizations in order to promote a strong business base through joint business attraction and retention efforts that include marketing and outreach, technical assistance, workforce development, training, and welcome/orientation activities for new businesses.”* In that Seed to Leaf is a local business within Sebastopol and plans to promote the benefits of

cannabis by providing educational resources that highlight cannabis' positive effects on health and general well-being.

Zoning Ordinance Consistency:

The project, as proposed, fits within the zoning ordinance in that the cannabis distribution would be an allowed use, after securing an approved conditional use permit. The project also consistent with the zoning ordinance in that it provides a robust security plan along with an odor plan as required within the general operation requirements of section 17.360.070 of the city's cannabis ordinance. The site will also include multiple permits, the applicant has noted through the provided floor plan that each license type will be properly separated as required by local and state law.

Environmental Review:

The project is categorically exempt from the requirements of CEQA pursuant to Section 15301(a) which includes "interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances." The project would be exempt in that it alters the interior of Suites A and J of 400 Morris Street to provide small scale distribution which will increase the productivity of the other allowed uses within this building and will not create any new environmental impacts as it will be in an already developed area.

City Departmental Comments:

This application was routed to the following departments for review; Building, Engineering, Fire, Public Works, City Manager, Assistant City Manager/Clerk, Sonoma County Health Department. The following departments provided comments.

- **Public Works:**
 - This project will require an industrial waste permit for the commercial kitchen.
- **Sonoma County Health Department:**
 - A cannabis facility permit issued by EHS is required for the operation of a cannabis dispensary, including an establishment that delivers cannabis and cannabis products as part of retail sale, and/or a facility that manufactures cannabis infused edibles. Please refer the applicant to EHS to initiate the permitting process, including plan review, site evaluation and construction inspections. Cannabis Health Permit information can be obtained by calling (707) 565-6565 (M-F, 8:00 AM - 4:00 PM) or online at <https://sonomacounty.ca.gov/Health/Environmental-Health/Cannabis-Permits/>.
 - If composting on site is proposed, a review of the proposal is required by the Sonoma County Local Enforcement Agency for Solid Waste to determine if a Solid Waste Permit is required prior to commencing operations.

Required Findings:

The required findings for a Conditional Use permit are below as follows.

- A. The proposed use is consistent with the General Plan and all applicable provisions of this title.

- B. The establishment, maintenance, and operation of the use applied for will not, under the circumstances of the particular case (location, size, design, and operating characteristics), be detrimental to the health, safety, peace, morals, comfort, or general

welfare of persons residing or working in the area of such use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the City. (Ord. 1111, 2018)

In addition to the conditional use permit findings specified in Chapter 17.415 SMC, applications subject to a conditional use permit requirement shall also be evaluated in regard to the following criteria, which may also be utilized by the approving authority to rank applications where there are multiple applicants for a limited number of allowances.

- A. Appropriateness of site and building for the use, including but not limited to adequacy of pedestrian and vehicle circulation, parking, and other aspects.
- B. Compatibility with surrounding uses.
- C. Experience and qualifications of the applicant.
- D. Operational, security, safety, noise, and odor control plans and improvements.
- E. Suitable site and building design and improvements.
- F. Whether the application will result in an overconcentration of such uses within the community.
- G. Energy conservation and other environmental aspects. (Ord. 1111, 2018)

Analysis:

With the distribution being loosely described in the initial application staff requested additional information on the way Seed to Leaf will operate with its distribution permit, if granted. Attached to this staff report is Seed to Leaf's answers for the questions staff posed and a summary is listed here. The distribution will also allow Seed to Leaf to move plant material to the processing site in Suite J. Seed to Leaf will also have one self-dedicated delivery vehicle that will access the site through the shipping and receiving roll-up door with the proper safety and security protocols. Seed to Leaf expects deliveries to be made in bulk with a schedule of two to three per week during peak season. The attached document explains the path of travel of product within the facility.

As detailed in the applicant's submittal, the proposed use will comply with regulations applicable to all cannabis businesses as follows:

Dual Licensing. Upon approval of this Use Permit, Seed to Leaf will apply for the appropriate state and city licensing requirements, which include background and felony conviction checks. Seed to Leaf will not operate this distribution use until licensing from both state and local authorization is approved.

Minors. Consistent with the state and local regulations, the business will not provide access to the facility for anyone under the age of 21. To ensure compliance with this regulation, a valid government-issued ID will be required prior to gaining access to the facility. Additionally, the entrance to the facility will include a statement of the age restriction.

Inventory and Tracking. As required by state and local regulations, Seed to Leaf will operate within inventory and tracking standards set by the City of Sebastopol. Seed to Leaf will also operate and adhere to the track-and-trace program enacted by the State of California.

Multiple Permits per Site. Seed to Leaf already operates with two other approved cannabis permits on site. Each use will be clearly and distinctly separated from the other as required by state and local law.

Building and Fire permits. Prior to commencement of the proposed use, the applicant will obtain all required building and fire permits. Fire permits and inspections will be obtained annually and prior to occupation. Storage, use, handling, and generation of hazardous waste will comply with the Health and Social Care and California Fire Code requirements. Keys to the facilities gates and doors will also be provided to the Fire Department.

Transfer of Ownership or Operator. Seed to Leaf will not transfer ownership or the operational control to another person unless and until the transferee obtains an administrative permit from the Planning Department verifying compliance with requirements of this chapter and stating that the transferee is now the permittee. The administrative approval clearance shall commit the transferee to compliance with all conditions of this permit.

Security. As detailed in the applicant's Security Plan (not published for security reasons), adequate lighting, 24-hour surveillance, and alarms will be installed at the facility. Secure storage of cannabis products, currency, and waste as well as safe transportation of cannabis are also detailed in the Security Plan, which has been reviewed by the Sebastopol Police Chief. All locks will be of a commercial grade and will comply with the California Building Code. Emergency access will comply with the requirements of the California Building Code and the City of Sebastopol Fire Department.

Odor Control. Seed to Leaf will work with a certified engineer to ensure sufficient odor prevention measures are in place to prevent the detection of cannabis odor from outside the structure. The Odor Mitigation Plan will include operations process, maintenance plan, staff training procedures, and engineering controls.

Lighting. Interior and exterior lighting will be shielded to prevent light pollution onto neighboring properties. All lighting will be compliant with the California Building Code.

Noise. The use of air conditioning and ventilation equipment will not contribute to noise pollution. Generators will not be used unless in a short-term emergency.

Public Comment:

As prescribed by Section 17.460 of the Zoning Ordinance, the Planning Department completed the following: (1) Provided written notice to all property owners within 600 feet of the external boundaries of the subject property; (2) provided a written notice that was published in the Sonoma West Times; and (3) posted three written notices publicly on and within vicinity of the subject property.

No public comments have been received as of the writing of this staff report.

Recommendation:

Staff believes the proposed use is compatible with the site, and recommends approval, subject to the Recommended Conditions of Approval and any additional or modified conditions the Planning Commission determines is appropriate.

If it is the consensus of the Planning Commission that the proposed cannabis distribution use is compatible with the site and surrounding uses, staff recommends that the application be approved based on the facts, findings, and analysis set forth in this staff report and subject to the conditions of approval outlined in Exhibit B.

Attachments:

1. Application materials, including plans.
2. Exhibit A.
3. Exhibit B.
4. Applicant's response to additional questions

EXHIBIT A
CONDITIONAL USE PERMIT: 2021-070
Cannabis Distribution
400 Morris St Suite A&J

Recommended Findings of Approval:

1. The proposed use is consistent with the General Plan and all applicable provisions of this title in that the proposed use is consistent with the Industrial M district and an allowed use with a conditional use permit.
2. The establishment, maintenance, and operation of the use applied for will not, under the circumstances of the particular case (location, size, design, and operating characteristics), be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or working in the area of such use or be detrimental or
3. Appropriateness of site and building for the use, including but not limited to adequacy of pedestrian and vehicle circulation, parking, and other aspects in that the expanded use will not negatively affect the pedestrian or vehicle circulation as the applicant promotes alternative modes of transportation to its team.
4. Compatibility with surrounding uses in that the proposed use is consistent with the surrounding industrial uses the project site is zoned Industrial (M) and is occupied by other industrial and commercial uses. Some uses include doctor's office, medical laboratory, solar energy contractor, and a vending machine company.
5. Experience and qualifications of the applicant in that the applicant has provided decades of experience within the cannabis industry both on a state and local level.
6. Operational, security, safety, noise, and odor control plans and improvements in that the provided plans have been reviewed and approved by the city departments.
7. Suitable site and building design and improvements in that the applicant will work with the building and fire department to be up to current California Building and Fire Code.
8. Whether the application will result in an overconcentration of such uses within the community in that the applicant will not be open to the public which will have minimal impact on the surrounding publicly zoned uses.
9. Energy conservation and other environmental aspects, in that the applicant's goal is to be eco-friendly for waste management which includes composting, recycling, and keeping garbage production low.

EXHIBIT B
CONDITIONS OF APPROVAL

Conditional Use Permit
400 Morris St, Suite A & J
004-011-068, 2021-070

1. Plans shall be in substantial conformance with plans prepared by Seed to Leaf the and attached plans within the application submittal and stamped received on December 13th, 2021, and on file at the City of Sebastopol Planning Department, except as modified herein:
 - a) This project will require an industrial waste permit for the commercial kitchen as required by the Public Works department.
 - b) A cannabis facility permit issued by EHS is required for the operation of a cannabis dispensary, including an establishment that delivers cannabis and cannabis products as part of retail sale, and/or a facility that manufactures cannabis infused edibles. Please refer the applicant to EHS to initiate the permitting process, including plan review, site evaluation and construction inspections. Cannabis Health Permit information can be obtained by calling (707) 565-6565 (M-F, 8:00 AM - 4:00 PM) or online at <https://sonomacounty.ca.gov/Health/Environmental-Health/Cannabis-Permits/> as required by the Sonoma County Health Department.
 - c) If composting on site is proposed, a review of the proposal is required by the Sonoma County Local Enforcement Agency for Solid Waste to determine if a Solid Waste Permit is required prior to commencing operations as required by the Sonoma County Health Department
2. All construction shall conform to the approved plans.
3. The applicant shall obtain a Building Permit prior to the commencement of construction activities.
4. The City of Sebastopol and its agents, officers and employees shall be defended, indemnified, and held harmless from any claim, action or proceedings against the City, or its agents, officers and employees to attach, set aside, void, or annul the approval of this application or the environmental determination which accompanies it, or which otherwise arises out of or in connection with the City's action on this application, including but not limited to, damages, costs, expenses, attorney's fees, or expert witness fees.
5. Minor changes may be approved administratively by the Planning Director or their respective designee upon receipt of a substantiated written request by the applicant. Prior to such approval, verification shall be made by each relevant Department or Division that the modification is consistent with the application fees paid and environmental determination as conditionally approved. Changes deemed to be major or significant in nature shall require a formal application or amendment.
6. The terms and conditions of this conditional use permit shall run with the land and shall be

binding upon and be to the benefit of the heirs, legal representatives, successors and assigns of the permittee.

7. Approval is valid for three (3) years, except that the applicant may request a one (1) year extension of this approval from the Planning Director, pursuant to Section 17.400.100 of the Zoning Ordinance.
8. The Planning Director shall interpret applicable requirements in the event of any redundancy or conflict in conditions of approval.



City of Sebastopol

Planning Department
7120 Bodega Avenue
Sebastopol, CA 95472
(707) 823-6167

**MASTER PLANNING
APPLICATION FORM**

APPLICATION TYPE

- | | | |
|--|---|---|
| <input type="checkbox"/> Administrative Permit Review | <input type="checkbox"/> Lot Line Adjustment/Merger | <input type="checkbox"/> Temporary Use Permit |
| <input type="checkbox"/> Alcohol Use Permit/ABC Transfer | <input type="checkbox"/> Preapplication Conference | <input type="checkbox"/> Tree Removal Permit |
| <input checked="" type="checkbox"/> Conditional Use Permit | <input type="checkbox"/> Preliminary Review | <input type="checkbox"/> Variance |
| <input type="checkbox"/> Design Review | <input type="checkbox"/> Sign Permit | <input type="checkbox"/> Other _____ |

This application includes the checklist(s) or supplement form(s) for the type of permit requested: Yes No

REVIEW/HEARING BODIES

- Staff/Admin Design Review/Tree Board Planning Commission City Council Other _____

APPLICATION FOR

Street Address: 400 Morris Street, Suites A & J Assessor's Parcel No(s): 004-011-068

Present Use of Property: Cannabis Manufacturing and Processing Facility Zoning/General Plan Designation: M: Industrial

APPLICANT INFORMATION

Property Owner Name: Robert Hillman

Mailing Address: 6191 Vine Hill School Road Phone: ~~707-829-2610~~ 490 6522

City/State/ZIP: Sebastopol, CA 95472 Email: bob@reenergyworld.com

Signature: *Robert Hillman* Date: 11/24/2021

Authorized Agent/Applicant Name: Andrew Longman

Mailing Address: 105 Morris St. #214 Phone: (707) 217-6903

City/State/ZIP: 95472 Email: andrew.longman@421.group

Signature: *Andrew Longman* Date: 12/01/2021
Andrew Longman (Dec 1, 2021 11:56 PST)

Contact Name (If different from above): Phone/Email:

PROJECT DESCRIPTION AND PERMITS REQUESTED (ATTACH ADDITIONAL PAGES IF NECESSARY)

This project proposal and permit request is for a conditional use permit allowing for cannabis distribution at the proposed facility. please see the written statement portion of the submitted application for more information

CITY USE ONLY

Fill out upon receipt:	Action:	Action Date:
Application Date: _____	Staff/Admin: _____	Date: _____
Planning File #: _____	Planning Director: _____	Date: _____
Received By: _____	Design Review/Tree Board: _____	Date: _____
Fee(s): \$ _____	Planning Commission: _____	Date: _____
Completeness Date: _____	City Council: _____	Date: _____

SITE DATA TABLE

If an item is not applicable to your project, please indicate "Not Applicable" or "N/A" in the appropriate box; do not leave cells blank.

SITE DATA TABLE	REQUIRED / ZONING STANDARD	EXISTING	PROPOSED
Zoning	N/A	N/A	N/A
Use	N/A	N/A	N/A
Lot Size	N/A	N/A	N/A
Square Feet of Building/Structures (if multiple structures include all separately)	N/A	N/A	N/A
Floor Area Ratio (F.A.R)	N / A FAR	N / A FAR	N / A FAR
Lot Coverage	N/A % of lot	N/A % of lot	N/A % of lot
	N/A sq. ft.	N/A sq. ft.	N/A sq. ft.
Parking	N/A	N/A	N/A
Building Height	N/A	N/A	N/A
Number of Stories	N/A	N/A	N/A
Building Setbacks – Primary			
Front	N/A	N/A	N/A
Secondary Front Yard (corner lots)	N/A	N/A	N/A
Side – Interior	N/A	N/A	N/A
Rear	N/A	N/A	N/A
Building Setbacks – Accessory			
Front	N/A	N/A	N/A
Secondary Front Yard (corner lots)	N/A	N/A	N/A
Side – Interior	N/A	N/A	N/A
Rear	N/A	N/A	N/A
Special Setbacks (if applicable)			
Other (N/A)	N/A	N/A	N/A
Number of Residential Units	N/A Dwelling Unit(s)	N/A Dwelling Unit(s)	N/A Dwelling Unit(s)
Residential Density	1 unit per N/A sq. ft.	1 unit per N/A sq. ft.	1 unit per N/A sq. ft.
Useable Open Space	N/A sq. ft.	N/A sq. ft.	N/A sq. ft.
Grading	Grading should be minimized to the extent feasible to reflect existing topography and protect significant site features, including trees.	N/A	Total: N/A cu. yds. Cut: N/A cu. yds. Fill: N/A cu. yds. Off-Haul: N/A cu. yds
Impervious Surface Area	N/A	N/A % of lot	N/A % of lot
		N/A sq. ft.	N/A sq. ft.
Pervious Surface Area	N/A	N/A % of lot	N/A % of lot
		N/A sq. ft.	N/A sq. ft.

CONDITIONS OF APPLICATION

1. All Materials submitted in conjunction with this form shall be considered a part of this application.
2. This application will not be considered filed and processing may not be initiated until the Planning Department determines that the submittal is complete with all necessary information and is "accepted as complete." The City will notify the applicant of all application deficiencies no later than 30 days following application submittal.
3. The property owner authorizes the listed authorized agent(s)/contact(s) to appear before the City Council, Planning Commission, Design Review/Tree Board and Planning Director and to file applications, plans, and other information on the owner's behalf.
4. The Owner shall inform the Planning Department in writing of any changes.
5. **INDEMNIFICATION AGREEMENT:** As part of this application, applicant agrees to defend, indemnify, release and hold harmless the City, its agents, officers, attorneys, employees, boards, committees and commissions from any claim, action or proceeding brought against any of the foregoing individuals or entities, the purpose of which is to attack, set aside, void or annul the approval of this application or the adoption of the environmental document which accompanies it or otherwise arises out of or in connection with the City's action on this application. This indemnification shall include, but not be limited to, damages, costs, expenses, attorney fees or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the City's action on this application, whether or not there is concurrent passive or active negligence on the part of the City.

If, for any reason, any portion of this indemnification agreement is held to be void or unenforceable by a court of competent jurisdiction, the remainder of the agreement shall remain in full force and effect.

NOTE: The purpose of the indemnification agreement is to allow the City to be held harmless in terms of potential legal costs and liabilities in conjunction with permit processing and approval.

6. **REPRODUCTION AND CIRCULATION OF PLANS:** I hereby authorize the Planning Department to reproduce plans and exhibits as necessary for the processing of this application. I understand that this may include circulating copies of the reduced plans for public inspection. Multiple signatures are required when plans are prepared by multiple professionals.
7. **NOTICE OF MAILING:** Email addresses will be used for sending out staff reports and agendas to applicants, their representatives, property owners, and others to be notified.
8. **DEPOSIT ACCOUNT INFORMATION:** Rather than flat fees, some applications require a 'Deposit'. The initial deposit amount is based on typical processing costs. However, each application is different and will experience different costs. The City staff and City consultant time, in addition to other permit processing costs, (i.e., legal advertisements and copying costs are charged against the application deposit). If charges exceed the initial deposit, the applicant will receive billing from the City's Finance department. If at the end of the application process, charges are less than the deposit, the City Finance department will refund the remaining monies. Deposit accounts will be held open for up to 90 days after action or withdrawal for the City to complete any miscellaneous clean up items and to account for all project related costs.
9. **NOTICE OF ORDINANCE/PLAN MODIFICATIONS:** Pursuant to Government Code Section 65945(a), please indicate, by checking the boxes below, if you would like to receive a notice from the City of any proposal to adopt or amend any of the following plans or ordinances if the City determines that the proposal is reasonably related to your request for a development permit:

A general plan

A specific plan

An ordinance affecting building permits or grading permits

A zoning ordinance

Certification

I, the undersigned owner of the subject property, have read this application for a development permit and agree with all of the above and certify that the information, drawings and specifications herewith submitted are true and correct to the best of my knowledge and belief and are submitted under penalty of perjury. I hereby grant members of the Planning Commission, Design Review Board and City Staff admittance to the subject property as necessary for processing of the project application.

Property Owner's Signature: _____

Date: _____

11/24/2021

I, the undersigned applicant, have read this application for a development permit and agree with all of the above and certify that the information, drawings and specifications herewith submitted are true and correct to the best of my knowledge and belief and are submitted under penalty of perjury.

Applicant's Signature: _____

Dennis Hunter

Dennis Hunter (Nov 30, 2021 17:37 PST)

Date: _____

11/30/2021

NOTE: It is the responsibility of the applicant and their representatives to be aware of and abide by City laws and policies. City staff, Boards, Commissions, and the City Council will review applications as required by law; however, the applicant has responsibility for determining and following applicable regulations.

Neighbor Notification

In the interest of being a good neighbor, it is highly recommended that you contact those homes or businesses directly adjacent to, or within the area of your project. Please inform them of the proposed project, including construction activity and possible impacts such as noise, traffic interruptions, dust, larger structures, tree removals, etc.

Many projects in Sebastopol are remodel projects which when initiated bring concern to neighboring property owners, residents, and businesses. Construction activities can be disruptive, and additions or new buildings can affect privacy, sunlight, or landscaping. Some of these concerns can be alleviated by neighbor-to-neighbor contacts early in the design and construction process.

It is a "good neighbor policy" to inform your neighbors so that they understand your project. This will enable you to begin your construction with the understanding of your neighbors and will help promote good neighborhood relationships.

Many times, development projects can have an adverse effect on the tranquility of neighborhoods and tarnish relationships along the way. If you should have questions about who to contact or need property owner information in your immediate vicinity, please contact the Building and Safety Department for information at (707) 823-8597, or the Planning Department at (707) 823-6167.

I have informed site neighbors of my proposed project: Yes No

If yes, or if you will inform neighbors in the future, please describe outreach efforts:

Seed to Leaf has dedicated time and resources to canvassing and connecting with our neighboring business owners in order to create meaningful relationships and build rapport. We listened and considered the input of our neighbors, and we are working to ensure that the hopes and concerns brought forth from these stakeholders are addressed and followed up with. We will continue to proactively check in with members of our community and neighbors to make sure that we are making the health and vibrancy of our community a top priority. We plan to be an active and positive participant in our neighborhood and look forward to working alongside our neighbors in beautifying and improving the community in which we live and operate.

Website Required for Major Projects

Applicants for major development projects (which involves proposed development of **10,000 square feet of new floor area or greater, or 15 or more dwelling units/lots**), are required to create a project website in conjunction with submittal of an application for Planning approval (including but not limited to Subdivisions, Use Permits, Rezoning, and Design Review). Required information may be provided on an existing applicant web site.

The website address shall be provided as part of the application. The website shall be maintained and updated, as needed until final discretionary approvals are obtained for the project.

Such website shall include, at a minimum, the following information:

- ✓ Project description
- ✓ Contact information for the applicant, including address, phone number, and email address
- ✓ Map showing project location
- ✓ Photographs of project site
- ✓ Project plans and drawings












Master Planning Application Form (Distro)

Final Audit Report

2021-12-01

Created:	2021-11-27
By:	Mike Thomson (legal@421.group)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7p_yUiHF5a4qmTptVH0S4jJJT2X7jEbj

"Master Planning Application Form (Distro)" History

-  Document created by Mike Thomson (legal@421.group)
2021-11-27 - 4:13:58 AM GMT- IP address: 108.197.232.84
-  Document emailed to Dennis Hunter (dennis@cannacraft.com) for signature
2021-11-27 - 4:15:58 AM GMT
-  Email viewed by Dennis Hunter (dennis@cannacraft.com)
2021-11-27 - 4:16:04 AM GMT- IP address: 66.249.84.193
-  Email viewed by Dennis Hunter (dennis@cannacraft.com)
2021-11-29 - 6:43:36 PM GMT- IP address: 66.249.84.223
-  Email viewed by Dennis Hunter (dennis@cannacraft.com)
2021-11-30 - 1:15:07 AM GMT- IP address: 66.249.84.220
-  Email viewed by Dennis Hunter (dennis@cannacraft.com)
2021-12-01 - 1:36:41 AM GMT- IP address: 66.249.84.205
-  Document e-signed by Dennis Hunter (dennis@cannacraft.com)
Signature Date: 2021-12-01 - 1:37:05 AM GMT - Time Source: server- IP address: 73.252.252.179
-  Document emailed to Andrew Longman (andrew.longman@421.group) for signature
2021-12-01 - 1:37:07 AM GMT
-  Email viewed by Andrew Longman (andrew.longman@421.group)
2021-12-01 - 1:50:13 AM GMT- IP address: 66.249.84.219
-  Document e-signed by Andrew Longman (andrew.longman@421.group)
Signature Date: 2021-12-01 - 7:56:33 PM GMT - Time Source: server- IP address: 24.5.16.36
-  Agreement completed.
2021-12-01 - 7:56:33 PM GMT



Application for a Conditional Use Permit for a Cannabis Distribution Operation

Seed to Leaf TM

400 Morris Street, Suite A & J

Sebastopol, CA 95472

APN: 004-011-068

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Purpose

This is an application to modify our Suite A + J use so we can self-distribute our cannabis product. In the current state of the cannabis industry, it is logistically cumbersome to rely on outside distributors for the movement of supply chain materials. We need to be able to control the safety and quality of our own distribution network. The distribution aspect of this project will be very slim, consisting only of a small, secured storage area, which will be used almost entirely to support the other uses of this operation.

Description of Business

Existing Uses

Seed to Leaf™ currently operates at 400 Morris Street, Suite A & J, Sebastopol, CA 95472. The space is already permitted by the City of Sebastopol with a manufacturing permit (2020-062) and a processing permit (2021-038), and licensed by the State of California with Type 6 - Manufacturing. The state processing license application is in the process of being submitted. The property is zoned Industrial (M), which permits these types of cannabis businesses with Administrative Review. Administrative Permit approval was previously granted at 400 Morris St. Suite A for Smoke Society on June 6, 2018 (2018-62, relinquished) and for Seed to Leaf (2020-062). These existing uses would greatly benefit from having an integrated Distribution License to more effectively coordinate and control the safe movement of cannabis and cannabis products in and out of the facility.

Proposal

This project proposal and permit request is for a Conditional Use Permit for Cannabis Distribution to include distribution privileges in addition to the existing processing and manufacturing privileges that are already approved by the City of Sebastopol at this location. In addition to recovering and distilling the essence of cannabis, Seed to Leaf™ plans to be responsible for transporting cannabis goods between licensees, arranging for testing of cannabis goods, and conducting the quality assurance reviews of cannabis products. Upon approval of this application, Seed to Leaf™ will file for a Distribution cannabis license (Type 11) with the state of California. This is the third permitted use we are applying for, and the ability to Distribute in addition to Manufacturing and Processing will allow us to operate as a safe, efficient, and meaningful contributor to California's cannabis supply chain.

Our goal is to create a premier California cannabis brand by focusing on quality, customer service, and safety. Beyond distributing cannabis products, we plan to promote the benefits of cannabis by providing educational resources that highlight cannabis' positive effects on health and general well-being. We are dedicated to providing economic opportunities for our community members

and will do so by fostering their participation in California's burgeoning legal cannabis industry. As our Community Benefit Report states, we intend to donate a portion of our revenue to charitable causes and community outreach programs that benefit marginalized groups throughout Sonoma County.

Our objectives are fivefold:

1. Permitting + Licensing: Obtain a cannabis distribution permit from the City of Sebastopol and a distribution license from the State of California.
2. Design + Building: Create and maintain a safe, environmentally friendly distribution facility that complies with Sebastopol building and fire codes.
3. Industry Standard: Create a model that raises the bar for all other operations. We aim to serve as a best-practices resource for local governments and agencies looking to learn more about this industry.
4. Economic Stimulus: Help improve the economy of Sebastopol and Sonoma County. We will help Sebastopol fully participate in the evolution of the legal cannabis industry, further establishing Sebastopol as a destination for cannabis entrepreneurs in a growing economy.
5. Community Outreach: Partner with local organizations aligned with the cannabis industry to leverage donations of time and money toward organizations benefiting our neighborhood, our city, and Sonoma County.

As previously established, Seed to Leaf™ is not located near sensitive uses. The lot size of the proposed location is 36,665 sq. ft. The size of the industrial building is 23,131 sq. ft., and the combined size of the proposed suites is approximately 5,970 sq. ft. The proposed suites include three standard commercial door entries, one commercial roll-up garage door with security locks that is wide enough for a vehicle, and an ADA-compliant restroom. There is one floor in the proposed suite, and no new floors will be constructed. This is a highly secured supply chain facility, and it will only be occupied by employees and business associates over the age of twenty-one. There will be no public access for any reason.

Seed to Leaf™ will operate a secure facility that diligently complies with all state and local regulations in regards to security and safety measures, waste disposal, and light and odor mitigation. Please see the Operational, Security, Safety, And Odor Control Plan and Improvements section for more detailed information.

Seed to Leaf™ will also make it a priority to attend and participate in community events throughout the year. We believe that it is vital to participate in community events to engage with our neighbors and create ongoing connections to the business. Please see our Community Benefits Report (Attachment A) for more information on how we intend to engage and participate with our community and neighborhood.

State Licensing

Once Seed to Leaf™ receives local authorization, we will apply for our state license through the Department of Cannabis Control (DCC). We intend to apply for a Type 11 Distribution license, with both the designations of Category M for medical-use products and Category A for adult-use products. This is the appropriate license type for Seed to Leaf™ distribution operations as defined in the DCC regulations.

In summary, the *California Code of Regulations Title 4 Division 19. Department of Cannabis Control, Chapter 2. Distributors Section §15300* states that a licensed distributor “shall distribute only cannabis goods and cannabis products, cannabis accessories, and licensees’ branded merchandise or promotional materials.”

Business Class

Seed to Leaf™ is applying for a Conditional Use Permit for Cannabis Distribution with the City of Sebastopol. A Cannabis Distribution License means that we will conduct the procurement, sale, storage, packaging, labeling, and transportation of medical and adult-use cannabis products between other licensed cannabis businesses.

Compliance Analysis for Class of Business and General Operating Requirements

At Seed to Leaf™, we have planned our cannabis business operation in complete accordance with Sebastopol’s *Title 17: Zoning Code, Chapter 17.360 Comprehensive Cannabis Regulations*. Seed to Leaf™ will also comply with all of the State of California’s requirements regarding cannabis distributor activity as outlined in the *California Code of Regulations Title 4 Division 19. Department of Cannabis Control, Chapter 2. Distributors*. Detailed descriptions of how we meet California State requirements are outlined below in our Plan of Operation.

Dual Licensing

Seed to Leaf™ knows that dual licensing, both at the city and state level, is required for all cannabis businesses. In minding these standards, Seed to Leaf™ will follow all applicable city and state licensing requirements, including performing all necessary background checks and felony conviction checks, and will adhere to any locational criteria.

As a new cannabis distribution operator, Seed to Leaf™ will commence operations only after both local authorization and state licensing are received. For more detail, please reference the section titled State Licensing, below.

Seed to Leaf™ is aware that grounds for revocation are in place. If Seed to Leaf™ fails to demonstrate dual licensing, it is understood that the city's approval shall be considered for revocation. Revocation at the city level will prevent our cannabis business from operating until a new permit or state license is obtained.

Minors

Seed to Leaf™ will observe all standards pertaining to minors set forth in § 17.360.070. In compliance with state law, because we are an adult-use facility, no one under the age of 21 will be employed or allowed to enter the premises. A valid government-issued photo ID that verifies that the individual is at least 21 years of age will be necessary for anyone to gain entrance to the facility. The entrance to the cannabis business will be clearly marked and will include a notice that states this age restriction.

Inventory and Tracking

In compliance with all inventory and tracking standards set up by the City of Sebastopol, Seed to Leaf™ will operate our cannabis business in a way that prevents the diversion of cannabis and will adhere to the track-and-trace program that the State of California enacts, including entering all information into METRC. For more details, please reference the section titled Track-and-Trace System, below.

Multiple Permits per Site

This application is for a third use permit at this location. Each use will be clearly and distinctly separated from one another as required by both state and local law. In compliance with this section of the General Operating Requirements, Seed to Leaf™ will not commence cannabis distribution operations until we receive local authorization and all necessary state licenses.

Building and Fire Permits

Seed to Leaf™ has received building and fire permits for their current configuration, and will obtain all building and fire permits for any future expansion. This includes obtaining a building permit that will confirm the occupancy classification in compliance with § 17.360.070. All fire permits, with inspections, will be obtained annually and prior to occupation. All storage, use, and handling of hazardous materials and generation of hazardous waste will comply with the Health and Social Care and California Fire Code requirements. Lastly, we will provide the Fire Department with keys to our gates and doors via the Knox Box.

Transfer of Ownership or Operator

If Seed to Leaf™ intends on transferring ownership or the operator, Seed to Leaf™ is aware this transference can and will only occur if the transferee obtains an Administrative Permit from the Planning Department, which must verify their compliance with *Title 17: Zoning Code, Chapter 17.360 Comprehensive Cannabis Regulations*. This will affirm that the transferee is listed as the permittee.

Security

In order to adhere to § 17.360.070, Seed to Leaf™ has arranged for proper security of the premises in an effort to provide public safety and the safety of any persons inside the facility. Security efforts will also help thwart theft from the facility. Adequate lighting, 24-hour video cameras, and alarms are understood as a part of this requirement. Additionally, we will ensure secure storage of cannabis products, currency, and waste as well as safe transportation of cannabis. All locks are commercial grade and compliant with the Building Code. Emergency access will be compliant with the California Fire Code and Sebastopol Fire Department. Seed to Leaf™ has contracted with Crime Alert Security, a security services company, in the creation of the attached Security Plan.

Please see our Operational Security Measures included below and the attached Security Plan (Attachment B) for further details.

Odor Control

Pertaining to the odor control standards in § 17.360.070, Seed to Leaf™ works with a certified engineer, Warner Mechanical Engineering, Inc., to ensure sufficient measures are in place to prevent the odor of cannabis from being detected outside our building in which the cannabis business operates. The Seed to Leaf™ odor mitigation plan includes an operational process, maintenance plan, staff training procedures as they pertain to odor mitigation, and engineering controls. Please see our attached Odor Control Plan (Attachment C) for further details.

Lighting

Lighting of the Seed to Leaf™ facility is thoughtful to the surrounding properties. Exterior lighting is stationary and shielded to prevent light pollution and is compliant with the building code. Interior lighting is similarly shielded to limit exterior glare.

Noise

Any use of air conditioning and ventilation equipment by Seed to Leaf™ will not contribute to noise pollution. Generators will not be used unless in a short-term emergency incident.

Findings

This application exemplifies that Seed to Leaf™ is dedicated to complying with all of the required special findings listed in the City of Sebastopol's *Title 17: Zoning Code, Chapter 17.360 Comprehensive Cannabis Regulations, Section 17.360.120 Special Findings*.

Appropriateness of Site and Building for Use

The Seed to Leaf™ proposed distribution operation site is an industrial building located at 400 Morris Street, Suite A & J. The site is within a parcel designated as an Industrial (M) zoning district. As stated in *Table 17.360-2: Permitted and Conditionally Permitted Cannabis Uses in the Commercial, Office and Industrial Zones of City of Sebastopol Zoning Code Chapter 17.360*, this designation has been approved for the industrial uses of cannabis distribution.

As detailed in our neighborhood context map (Attachment D), the proposed site is also very accessible; there are two bus stations located at the intersections of Laguna Park and Morris Street, walking distance from the proposed site.

Parking

In compliance with local parking requirements this suite will have a total of ten off-street parking spots. This location will also allow for pedestrian and vehicle circulation without impacting the surrounding area. Our team will be encouraged to use alternative modes of transportation to commute to work and will be permitted to securely store bicycles and safety equipment in the garage.

	Office Area	Warehouse Area	Production Area
Parking Requirement per use*	1 per 300 square feet	1 per 1000 square feet	1 per 500 square feet
HAL C1D1 Extraction Booth			235 SF
Food Infusion			640 SF
Office Space	426 SF		
Secured Storage		255 SF	
Processing		2045 SF	
Shipping and Receiving		430 SF	
Accessory Manufacturing		992 SF	
Distribution		172 SF	
Common Area		775 SF	
Total Square Footage Per Use	426 SF	4669 SF	875 SF
Total Parking Spots Required Per Use	2	5	2
Total Bicycle Parking Required (20% of vehicle parking requirement)	0	1	0

* as per Table 17.110-3: Parking Requirements of City of Sebastopol Zoning Code, Title 17

Compatibility with Surrounding Uses

Seed to Leaf™ is completely compatible with our surrounding uses. This Industrial (M) parcel is occupied by other commercial and industrial uses. Our neighboring businesses include a doctor's office, a solar energy contractor, a medical laboratory, and a vending machine company. Prior to receiving our manufacturing permit, we engaged each neighbor door to door to introduce ourselves and offer a primary point of contact for any questions, ideas, or concerns. We found no opposition, and many supporters. For more information regarding community outreach, please find the Canvassing Report in the attachment section below (Attachment E).

Seed to Leaf™ will have a minimal impact on the surrounding uses because our facility will not be open to the public. Our noise and odor mitigation measures will ensure that we seamlessly assimilate into the environment of our proposed location.

Seed to Leaf™ proposed site will be located away from any sensitive uses as defined by Sebastopol's *Title 17: Zoning Code, Chapter 17.360: Comprehensive Cannabis Regulations*.

Experience and Qualifications of the Applicant

The Seed to Leaf™ team's vision is to create sustainable, collaborative partnerships with manufacturers by becoming a go-to distributor that can safely distribute quality, locally grown cannabis all in one place. The owners and operators of Seed to Leaf™ are Dennis Hunter and Nayeli Rivera.

Nayeli Rivera

Nayeli was born to Mexican parents who immigrated to Sebastopol, CA in 1976. She was born and raised in Petaluma alongside her three brothers. Her family were pioneers of the Latino Community in Sonoma County. Her father, an immigration counselor, took Nayeli under his wing where she started volunteering and marching for justice and equality for all. She would help him with translations and appointments with his clients at even an early age. This led to her working as an interpreter at the U.S. Citizen and Immigration Services office in San Francisco. There she practiced compassion and humility when providing her services. Most of the time her services were on a donation basis as many of her clients were low income families. From there she worked as an interpreter with the Sonoma County office of Education supporting the Deaf & Hard of Hearing program. She accompanied families to doctor's appointments and offered her services beyond interpreting. Many of the families were new to the country and had no support. She would routinely go above and beyond to help these families overcome many obstacles and hardships. In 2010 she moved on to working in the wine industry through her family's business as farm labor contractors in Napa County. While there she quickly gained business experience and was able to make her mark in a predominately male run industry. Her desire to continue to grow and learn in business started there and continues to bloom.

Nayeli had a son while in High School but not only managed to graduate from High School with honors, she received a full ride scholarship to Sonoma State University. She married her husband, Nathan, in 2009 and together they had two more children growing up in Santa Rosa. In 2016 Nayeli and Nathan opened a premier plant-based organic restaurant in Santa Rosa, CA and continue to support the healthy living movement. Today they raise their family together in Sebastopol, CA.

Her business philosophy includes creating opportunity for women and people of color so that together our community can thrive. Breaking the stigma associated with cannabis in the Latino community as well as breaking the glass ceiling is part of Nayeli's passion.

Dennis Hunter

Dennis Hunter was born and raised in Northern California's Emerald Triangle. His passion for the cannabis industry is driven by the plants' overwhelming medical benefits for patients. His innovation in cultivation and production has earned him countless recognition over the years. He recently received the lifetime achievement award from Emerald Cup and was honored by High Times as one of the top 100 leaders in cannabis in 2018 and 2019. He is a relentless advocate for cannabis, patients-rights, and legislative change.

Dennis is the co-creator of the popular products GeoPots and Terpinator. Before launching CannaCraft he had several other businesses including, Left Coast Garden Wholesale – one of the leading garden supply businesses in the country. Dennis is also the co-founder of CannaCraft. Dennis works on extraction methods and formulating the next product for patients.

421 Group

Our Seed to Leaf™ team is supported by the experienced individuals at 421 Group, a California cannabis consultancy located here in Sebastopol. They possess several decades of combined experience in the cannabis industry. They help ensure that our operations are in complete compliance with the ever-changing regulations and will assist us in being an innovative, community-driven addition to the vibrant landscape of Downtown Sebastopol.

Operational, Security, Safety, Noise, and Odor Control Plans

Operation Plan

As included below in our Plan of Operation, Seed to Leaf™ operations will comply with all city and state rules and regulations.

Seed to Leaf™ will operate seven days a week from the hours of 8 a.m. to 6 p.m. Our facility will have no public entry and will be locked at all times. Only owners, staff, contractors, and officials with local or state government will be allowed on the premises. Any guests will need to arrange their visits ahead of time and will need to sign in with an authorized Seed to Leaf™ employee. Upon arrival, all guests must provide a government-issued photo ID that confirms they are over 21 years of age. No one under the age of 21 will be allowed on the premises.

Any actions involving cannabis goods will be input into the track-and-trace system, METRC. We will ensure that hard copies of important documents are kept in a secured location on site, and we will store copies of important documents electronically.

Security and Safety Plan

Security and safety are paramount priorities for Seed to Leaf™. This is exemplified by our redacted security plan, included below, and by the attached security plan created by Crime Alert Security. Our security plan includes the use of 24-hour security cameras, a professionally monitored alarm system, on-call emergency contact, product storage in a limited-access secured vault, secure waste disposal, secure transportation, code-compliant building security features, and emergency access.

Please see our Operational Security Measures, included below, and the attached Security Plan (Attachment B) for further details.

Safety and security are a top priority for Seed to Leaf™. Our location is in a well-lit, nondescript business park, and we will continue to not post any obvious or identifying signage on the exterior of the building. In addition to our low profile, we have increased our security with an alarm system as well as twenty-four-hour monitoring service and ninety-day recording archives for our surveillance system saved to cloud storage. Employee training plans are prepared and will be in place, not only for safe operation within the facility, but also for safely entering and exiting the facility. The “buddy system” will be used during the dark hours in the early morning and evening for all employees coming or going from the building.

Noise Control Plan

Seed to Leaf™ operations will not contribute to an increase of noise on the proposed site. Any use of air conditioning and ventilation equipment by Seed to Leaf™ will not contribute to noise pollution.

Odor Control Plan

For Seed to Leaf™, being a good neighbor means taking precautions to create a thoughtful odor control plan. Seed to Leaf™ odor control measures will ensure that cannabis odor is not detected outside of our unit as required by Sebastopol City code and state regulations.

Our measures include the installation of new HVAC and ventilation equipment, and our operational procedures have been designed to prevent the detection of any cannabis or cannabis-related odor from any area outside the distribution facility.

Waste Disposal

At Seed to Leaf™, all cannabis waste will be disposed of completely in compliance with local and state laws and will be made unrecognizable and unusable at the time of disposal. All cannabis waste will be placed in a locked waste receptacle that will be hauled away for disposal by Recology. All cannabis waste will be properly logged into METRC.

Suitable Site and Building Design and Improvements

The proposed site for Seed to Leaf™ is suitable because it is within a parcel designated as an Industrial (M) zoning district.

Seed to Leaf™ will work closely with the city's building department to ensure that our building design and proposed improvements fully comply with the California Building and Fire Code. As part of our build-out process, we intend to implement Distribution operations in a room on the premises, which will be the location for secured cannabis waste, quarantine storage, and compliance document storage. This Distribution space is accessible via a common space hallway, satisfying MAUCRSA's "separate and distinct" premise requirements.

The receiving vestibule in Suite A will also function as a common area which will serve for secure loading and unloading of transported materials for the manufacturing, distribution, and processing uses on the premises. Our receiving vestibule is a total of 430 sq. ft. It includes a roll-up door with a commercial-grade lock, and will be connected to the common hallway by a commercial-grade, locking door. To further enhance the security of the vestibule, both points of ingress and egress will be equipped with alarm sensors and security cameras.

We have established bicycle parking for the convenience of our staff.

Overconcentration of Such Uses within the Community

At Seed to Leaf™, we fully believe that Sebastopol's *Title 17: Zoning Code* prudently outlines the necessary framework to make certain that the business community of Sebastopol remains diverse. Part of our purpose and mission has been to complement businesses local to us and to foster Sonoma County's local economy with our environmentally and socially conscious businesses.

Seed to Leaf™ will have a minimal impact on surrounding public and zoned uses because our distribution facility will not be open to the public. Through our noise and odor mitigation measures, we will ensure seamless assimilation into the environment of our proposed location.

Energy Conservation and Other Environmental Aspects

Our conservation efforts will be present throughout all aspects of our operation. We have enrolled in Evergreen, Sonoma Clean Powers' wholly renewable energy option. We will also continue to use LED lights in our facility and, to the furthest extent possible, will use eco-friendly materials in our construction.

We plan to make our packaging as eco-friendly as possible, and this may consist of recyclable and biodegradable materials that are printed with soy-based inks.

Our waste management of non-cannabis goods will consist of composting, recycling, and keeping garbage production at the lowest amount possible. During our earlier construction in the space, we have installed water-efficient appliances. Any future modifications or additions will keep with these commitments.

Employee Information

The team is working diligently to create an innovative and community-driven business model that will ensure the success of Seed to Leaf™ in full compliance with all local and state laws.

Our Distribution employees will be part of the larger employee group that also works within our Manufacturing and Processing spaces, and that these new duties will be shared part time between two employees. We estimate that the total operations of Seed to Leaf™ will launch with up to eight full-time employees. These employees will ensure that day-to-day operations run smoothly and in full compliance with all applicable regulations.

After we are granted full authorization to operate at our proposed location, we will commence operations with our initial staff team.

We estimate that as Seed to Leaf™ scales with success, the second-phase staffing structure will include four additional employees. This phase may span two consecutive shifts between the hours of 6:00 a.m. and 9:00 p.m., staggered appropriately to minimize the number of cars needing to be parked at the facility at any one time.

Seed to Leaf™'s operating management team will ensure full compliance with all employment laws. We will be an equal opportunity employer and will emphasize local hiring in the City of Sebastopol.

Plan of Operations

Seed to Leaf™ will operate in full compliance with all applicable state laws as outlined in the Department of Cannabis Control's *California Code of Regulations Title 4 Division 19*.

Premises

In accordance with *California Code of Regulations Title 4 Division 19 § 15000.3*, our premises are not in a location that will require anyone to pass through a business that sells alcohol or tobacco, nor a private residence, to reach our premises. The DCC will always have immediate access to the premises.

To comply with *§ 15000.3*, all structures included as part of the Seed to Leaf™ facility shall be permanently affixed to the land by a method that would cause the structure to ordinarily remain affixed for an indefinite period of time.

In compliance with §15000.4, Seed to Leaf™ will not sublet any area designated as the licensed premises.

Licensee's Responsibility for Acts of Employees and Agents

In accordance with §15000.5 Seed to Leaf™ takes full responsibility for the actions of our employees or anyone acting on behalf of our company.

Age Restriction

To comply with §15000.6, each employee who works for Seed to Leaf™ on premises or who will handle and transport cannabis goods will be at least 21 years of age. For more information, please reference the section titled Minors, above.

Designated M and A Commercial Cannabis Activity

Section §15000.2 handles Designated M and A Commercial Cannabis Activity. As a distributor, all commercial cannabis activity will take place between licensees. Additionally, we will transport and sell cannabis goods designated as "For Medical Use Only," only to M-designated retailers.

Storage of Inventory

In regards to §15000.7, no cannabis goods will be stored outdoors. Any employee break room, changing area, and bathroom will be located in a separate space from all storage areas. The primary storage of cannabis goods within the Distribution use space will be a locking cage bolted to the floor. This will house very little inventory and only for short times, as Distribution's primary function will be to transport products between the Manufacturing and Processing use spaces within this facility to other licensed facilities. That is to say, most product will be immediately transferred to another connected use space upon arrival to 400 Morris, and will be transferred to Distribution from another connected use space immediately before departure.

Significant Discrepancy in Inventory

In compliance with §15034, a significant discrepancy in our inventory means a difference in physical inventory against recorded inventory of at least 3 percent of the average monthly sales. In order to calculate average monthly sales, Seed to Leaf™ will use the average of the total sales per month for the previous six months.

Notification of Criminal Acts; Civil Judgments; Violations of Labor Standards; and Revocation of a Local License, Permit, or Other Authorization after Licensure

In accordance with *§15035*, Seed to Leaf™ will make sure to notify the DCC if our owner receives a criminal conviction. This notification will be made in writing and sent by traditional mail or electronic mail within 48 hours. The written notification to the Department will include the date of conviction, the court docket number, the name of the court in which the licensee was convicted, and the specific offense(s) for which the licensee was convicted.

If Seed to Leaf™, or any owner, receives a civil penalty or judgment rendered against them, we will alert the DCC in writing within 48 hours. This written notification shall include the date of verdict or entry of judgment, the court docket number, the name of the court in which the matter was adjudicated, and a description of the civil penalty or judgment rendered against the licensee.

Any administrative order or civil judgment for violations of labor standards against Seed to Leaf™ or any owner in their individual capacity warrants a notification to the DCC either by mail or electronic mail within 48 hours. The written notification shall include the date of the order, the name of the agency issuing the order, and a description of the administrative penalty or judgment rendered against the licensee.

Seed to Leaf™ will ensure that the DCC is notified in writing of the revocation of a local license, permit, or other authorization either by mail or electronic mail within 48 hours of receiving notice of the revocation. The written notification shall include the name of the local agency involved, a written explanation of the proceeding or enforcement action, and the specific violation(s) that led to revocation.

For any notification required in this section, Seed to Leaf™ will use the Notification and Request Form, DCC-LIC-027.

Notification of Theft, Loss, and Criminal Activity

Pursuant to *§15036*, Seed to Leaf™ has 24 hours to notify the DCC if we discover a significant discrepancy, diversion, theft, or loss in inventory. We will also report to the DCC if we discover loss or unauthorized alteration of records related to cannabis goods. To comply with *§15036*, Seed to Leaf™ will notify the DCC and local law enforcement within 24 hours of discovering any of the following situations:

- A significant discrepancy in our inventory, as defined in *§15036*
- Any type of diversion, theft, loss, or other criminal activity within the distribution operation
- A loss or unauthorized alteration of records in relation to cannabis goods, customers, employees, or agents

- Any other breach of security

Any notification to the DCC will include the date and time of the theft, loss, or criminal activity; the name of the local law enforcement agency that was notified; and a detailed account of the incident, including the item(s) that were taken or lost.

General Record Retention Requirements

Pursuant to §15037, we will keep and maintain the following records related to commercial cannabis activity for at least seven years:

- 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 (formerly Board of Equalization) under title 18, *California Code of Regulations, sections 1698 and 4901*
- 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
- Training records, including but not limited to the content of the training provided and the names of the employees who received the training
- Contracts with other licensees regarding commercial cannabis activity
- Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity
- All other documents prepared or executed by an owner or his or her employees or assignees in connection with the licensed commercial cannabis business

Further, the DCC will have our full consent to make any examination of our records or books that it considers necessary. All Seed to Leaf™ records will be kept in a way that provides easy access to the DCC through hard copy or electronic form. While we may utilize a third party to manage services of these records, we are ultimately responsible for the retention of these records under this section.

Advertising and Marketing

In compliance with §15040, any advertising or marketing placed by Seed to Leaf™ will adhere to the following restrictions

- They will only be displayed after we have obtained reliable up-to-date audience composition data demonstrating that at least 71.6 percent of the audience viewing the advertising or marketing is reasonably expected to be 21 years of age or older.
- They will not use any depictions or images of minors or anyone under 21 years of age.

- They will not contain the use of objects, such as toys, inflatables, movie characters, cartoon characters, or include any other display, depiction, or image designed in any manner likely to be appealing to minors or anyone under 21 years of age.
- They will not advertise free cannabis goods or giveaways of any type of products, including non-cannabis products, such as the following:
 - Buy one product, get one product free;
 - Free product with any donation; or
 - Contests, sweepstakes, or raffles.

Any outdoor signage, including billboards, will be affixed to a building or permanent structure and comply with the provisions of the Outdoor Advertising Act. No outdoor signage will be located within a 15-mile radius of the California border on an interstate highway or on a state highway that crosses the California border.

In addition, Seed to Leaf™ will provide audience composition data when necessary. We will remove any advertising or marketing that the DCC does not feel complies with the standards in this section.

To comply with § 15040.1, we will not sell or transport any cannabis products that are labeled as “beer, wine, liquor, or spirits” or any other term that might create the wrong impression that the product contains alcohol.

In accordance with § 15041.1, if Seed to Leaf™ chooses to sell branded merchandise that is not listed in Section 5000, Subsection (b), we will get express permission from the DCC before doing so.

Security Measures

Premises Access Requirements

To adhere to §15042, we will make sure that anyone on the premises, except for employees and contractors, are under supervision at all times when in the limited-access areas of the premises. All limited-access areas will have a door and lock that meet the requirements of §15046. The door to any limited-access area will stay closed when not in use. In reference to Distribution operations, the entire use space is contained within the receiving vestibule and is considered limited-access.

Video Surveillance System

Seed to Leaf will utilize a single video surveillance system for all use spaces in our facility, which is already installed for our Manufacturing operations. In compliance with §15044, we have a digital video surveillance system with a minimum camera resolution of 1280 x 720 pixels. Stored surveillance footage and/or our cameras will have transmission control protocol (TCP) that is capable of being accessed via the internet. The surveillance system is able to clearly record

images of the area it surveils. Every camera is mounted permanently in a fixed location. Areas where cannabis goods are weighed, packed, stored, loaded and unloaded for transportation, prepared, or moved within the premises are currently and will continue to be under video surveillance, as will limited-access areas, security rooms, and entrances to the facility (recorded from both indoor and outdoor vantage points). Cameras run 24 hours a day, seven days a week, and will include a time and date stamp, and will be kept for ninety days at minimum. We will happily share our surveillance recordings with local law enforcement or the DCC upon request.

Locks

Pursuant to § 15046, all of Seed to Leaf™ limited-access areas are locked securely with commercial-grade, nonresidential door locks. We have and will continue to use those commercial-grade, nonresidential door locks on all entrance and exit doors to the facility.

Alarm System

In regards to § 15047, Seed to Leaf™ has an alarm system installed, maintained, monitored, and responded to by a licensed alarm company. Any information we have regarding the alarm system, monitoring, and alarm activity will be made available to local law enforcement or the DCC upon request. For more information, please reference the section titled Alarm System, nested under Operational Security Measures, below.

Track-and-Trace Requirements

In compliance with §15047.2, we will create and maintain a track-and-trace system account before we conduct any commercial cannabis activity. Seed to Leaf™ has assigned one owner as the track-and-trace system account manager. This account manager has attended and completed the required track-and-trace system training and orientation, and will complete any required continuing education. The account manager will maintain a current list of track-and-trace system users, including their full names and usernames.

We will maintain a record outside of the track-and-trace system that details each compliance notice we receive from track-and-trace and how and when we complied with it. If compliance can not be achieved in three business days, we will alert the DCC immediately.

In order to adhere to §15049, we record all commercial cannabis activity in the track-and-trace system, including the following:

- Packaging of cannabis goods
- Sale and transfer of cannabis goods
- Transportation of cannabis goods to a licensee
- Receipt of cannabis goods
- Return of cannabis goods
- Destruction and disposal of cannabis goods

- Laboratory testing and results
- Any other activity as required pursuant to this division or by any other licensing authority

All activity entered into the track-and-trace system includes the following:

- The name and type of cannabis goods
- The unique identifier of the cannabis goods
- The amount of the cannabis goods by weight or count
- Total wholesale cost of the cannabis goods, if applicable
- The date and time of the activity or transaction
- The name and license number of other licensees involved in the activity or transaction

When the goods are being transported, we will create a shipping manifest generated through the track-and-trace system. This manifest will include the following:

- The name, license number, and premises address of the originating licensee
- The name, license number, and premises address of the licensee transporting the cannabis goods
- The name, license number, and premises address of the destination licensee receiving the cannabis goods into inventory or storage
- The date and time of departure from the licensed premises and approximate date and time of departure from each subsequent licensed premises, if any
- The arrival date and estimated time of arrival at each licensed premises
- The driver's license number of the personnel transporting the cannabis goods, and the make, model, and license plate number of the vehicle used for transport

When Seed to Leaf™ picks up or receives cannabis goods for transport, storage, or inventory, we will make sure that the cannabis goods we take possession of are as described in the shipping manifest and will record acceptance of the goods in the track-and-trace system. If there are any disparities between what is received and what is recorded on the shipping manifest, Seed to Leaf™ will record and document the difference in the track-and-trace system.

If the cannabis goods are going to be disposed of we will collect the following information and record it in the track-and-trace system:

- The name of the employee performing the destruction or disposal
- The reason for destruction or disposal
- The name of the entity being used to collect and process cannabis waste

If there is any spoilage of cannabis goods or the cannabis goods are compromised for any reason, we will record those instances in the track-and-trace system.

In compliance with § 15050, if Seed to Leaf™ loses connection to the track-and-trace system for any reason, we will keep detailed records independent of the track-and-trace system and notify the DCC immediately. Within three days of restoration of the track-and-trace system, Seed to Leaf™ will have all independently kept records transferred to the track-and-trace system.

To follow § 15051, Seed to Leaf™ will reconcile the physical inventory of cannabis goods at the licensed premises with the records in the track-and-trace database at least once every 30 calendar days. If there is a significant discrepancy between the two, Seed to Leaf™ will conduct an audit.

Acceptance or Rejection of Shipments

In compliance with §15052.1, no partial shipments will be accepted. We will accept or reject each shipment in whole, except when part of a shipment isn't listed on the shipping manifest or is wrongly listed, or if part of a shipment isn't compliant with labeling requirements or is past its best-by date. If we do need to refuse a shipment in whole or in part, we will record it in the track-and-trace system with an explanation regarding the exact reason it was rejected.

Storage of Batches for Testing

In order to comply with §15302, when Seed to Leaf™ stores cannabis goods for testing, we will store every batch of cannabis goods separately and distinctly from each other.

Every container of each batch will be labeled with the following:

- The name and license number of the manufacturer or cultivator who provided the batch
- The date of entry into our storage space
- The unique identifiers and batch number attached to the batch
- A detailed description of the batch
- The weight or quantity of the batch
- The sell-by or expiration date of the batch, if one has been provided

Packaging and Labeling

In compliance with § 15303, Seed to Leaf™ distribution operation may package, repackage, label, or relabel cannabis products for retail sale. All packages must meet the above requirements as well as the following requirements:

While Seed to Leaf™ has the option to produce pre-rolls that consist exclusively of any combination of flower, shake, leaf, or kief within the Distribution use space, these types of activities will generally take place in the Manufacturing use space of the same suite. Any pre-rolls produced will be rolled prior to regulatory compliance testing.

Seed to Leaf™ understands the regulation states that, as a distributor, we may not package, re-package, label, or relabel manufactured cannabis products within the Distribution use space.

However, laboratory testing reveals that a manufactured product has been labeled with the incorrect amount of THC, Seed to Leaf™ may relabel the package with the accurate THC amount. We will also relabel the packaging if the lab determines that there are any inaccurate counts of other cannabinoids or terpenes. The activity of packaging and labelling manufactured products under normal operations will take place in our Manufacturing use space prior to transfer to the Distribution use space.

Testing Arrangements

As defined by § 15304, after taking possession of a batch of cannabis goods, we will make contact with a cannabis testing laboratory and arrange for one of their employees to come to our premises to choose a representative sample to test.

Testing Sample

Further, according to § 15305, we will make sure that each sample taken is from a batch size that meets all DCC requirements. An employee of Seed to Leaf™ will always be available to witness the laboratory employee collect the testing sample and will make certain that the samples taken are taken from throughout the cannabis batch. The sample collection will be recorded on video, which will provide the batch number at the start of the recording and a visible time and date stamp. All video footage of sample collections will be held for at least 180 days. After the testing sample has been collected, our employee and the laboratory employee will sign and date the chain of custody form. No one from Seed to Leaf™ will assist the laboratory employee while they are obtaining the testing sample, and they will not touch any goods or equipment.

Laboratory Testing Results

In compliance with § 15306, Seed to Leaf™ understands that a cannabis testing sample is considered to pass when the sample meets predetermined specifications. Only when a batch passes can the cannabis good be transported to retailers. If a sample fails by not meeting predetermined specifications, we may attempt to remediate the sample with a licensed manufacturer, pursuant to §15727. If remediation is deemed not possible, we will destroy the batch that has failed laboratory testing.

Quality Assurance Review

Additionally, pursuant to § 15307, upon obtaining a certificate of analysis confirming that a sample has passed but before we transport any cannabis goods to retailers, we will ensure that the certificate of analysis we obtained does in fact correspond to the batch we are going to transport. We will ensure that the label on the cannabis goods is confirmed by the certificate of analysis regarding THC, cannabinoids, terpenes, and contaminants. We will make sure that the packaging is in compliance with all packaging laws and is tamper-evident. We will check that the

weight of the batch corresponds with the weight of the batch recorded in the track-and-trace system.

Any cannabinoid, total THC, total CBD, and terpenoid on a cannabis good label will be considered accurate if the difference in percentage on the certificate of analysis is plus or minus 10.0 percent. To calculate the difference in percentage, Seed to Leaf™ will utilize the DCC's recommended equation:

“Difference in percent = $\left| \frac{\text{laboratory measurement} - \text{label claim}}{\text{label claim}} \right| \times 100$ percent”

Insurance Requirements

As regulated in § 15308, we will always “carry and maintain commercial general liability insurance in the aggregate in an amount no less than \$2,000,000 and in an amount no less than \$1,000,000 for each loss.” Moreover, we will secure this insurance from a company that meets at least one of the following requirements:

- A nonadmitted insurer that meets the requirements of *Insurance Code § 1765.1* or *1765.2*, and the insurance is placed pursuant to *Insurance Code § 1763* and through a surplus line broker licensed under *Insurance Code § 1765*
- An insurer qualified to do business in California by the Secretary of State and authorized by the Insurance Commissioner to write the liability and property classes of insurance as defined by the Insurance Code *Sections 102, 103, 107, 108, 114, and 120*
- A registered risk retention group compliant with the California Risk Retention Act of 1991

If Seed to Leaf™ should ever experience a lapse in insurance, we will notify the DCC within 10 calendar days.

Inventory Accounting

To comply with § 15309, Seed to Leaf™ will be able to account for all of our inventory and supply that information to the DCC upon request. We will make sure all batches of cannabis goods have been stored in accordance with § 15302 of this division. Additionally, we will be able to supply the DCC with the status of each batch of cannabis goods, as follows:

- The batch is being held in storage for another licensee
- The batch is awaiting sampling for regulatory compliance testing
- The batch has been sampled and is awaiting testing results
- The batch has passed testing
- The batch has failed testing and is awaiting approval for remediation
- The batch has failed testing and is awaiting destruction
- The batch is being stored or held for any other lawful purpose under the Act or this division

Required Transport Vehicle Information

In regards to § 15312, upon request, we shall provide the Department with a copy of the certificate of ownership or registration card issued by the California Department of Motor Vehicles, the year, make, model, license plate number, and Vehicle Identification Number in writing, and proof of insurance for any vehicle or trailer used to transport cannabis or cannabis products.

Transport Personnel Requirements

In compliance with § 15313, no one under the age of 21 years old will be allowed to be in any of our commercial vehicles or trailers transporting cannabis goods. Only a licensee, one of our employees, or security personnel will be in any of our commercial vehicles while transporting cannabis goods.

Shipping Manifest

Pursuant to § 15314, before transporting cannabis goods, we will generate a shipping manifest via the track-and-trace system for either testing and sampling, sale of cannabis goods to a licensee, destruction or disposal of cannabis goods, or any other activity as required by the DCC. We will then transmit the shipping manifest directly to the DCC as well as the licensee that is to receive the cannabis goods before the goods have been transported. We will make sure that the cannabis goods we take into our possession at another licensed premises are correctly defined in the shipping manifest. We will not take any cannabis goods that are not on the shipping manifest or any cannabis goods that are not in the amount listed on the shipping manifest. We are fully responsible for any disparities between the shipping manifest and the cannabis goods while we are transporting them, and we are subject to whatever enforcement or discipline administered because of a disparity. Once an employee has left the licensed premises where the cannabis goods were picked up, they will not void or change a shipping manifest. A shipping manifest will go with every transport of cannabis goods. If the track-and-trace system access has not yet been obtained by the time we begin business, we are aware that we may create a shipping manifest separate from the track-and-trace system and email it to the DCC and the licensee receiving the shipment. If we have access to the track-and-trace system and the licensed business receiving the shipment does not have access to the track-and-trace system, we will create the shipping manifest in the track-and-trace system and transmit it to the DCC and send a copy to the licensee receiving the shipment by email.

Time of Operation

Because Seed to Leaf™ will be operating a distribution facility, our operation's planned business hours will eventually be from 6:00 a.m. to 9:00 p.m., seven days a week. Initially only one shift is planned that will be from 8:00 a.m. to 6:00 p.m. As the operation grows, up to two staggered shifts are planned, utilizing the full operating hours of 6:00 a.m. to 9:00 p.m. We will ensure that our operations are quiet and do not disturb our neighborhood.

Staff Training

Seed to Leaf™ will train all staff and will implement a training program that addresses all applicable California, City of Sebastopol, and Sonoma County Health Services laws, regulations, and conditions of approval. Training will also cover information regarding civil, criminal, and administrative liability; procedures for preventing and refusing access; sales; and service to minors and intoxicated individuals. Additionally, staff will be trained on procedures for checking legally acceptable forms of identification, safety and security procedures, incident reporting, law enforcement liaison policies, and our Good Neighbor Policy.

Staff training is a vital component to the overall success of our operation. All of our employees will be thoroughly trained upon hiring, and training will be readdressed yearly.

All Seed to Leaf™ employees will complete a set of four specialized onboarding trainings:

1. Company policy and HR handbook training
2. Safety and security training
3. Cannabis compliance training
4. Role-specific procedural training

All of our training records will be kept and shared with the Sebastopol Police Department upon request.

Company Policy and HR Handbook Training

Each staff member will receive training from their manager and/or the head of human resources. This initial training covers each section of our HR handbook upon employment at Seed to Leaf™. Our handbook covers all basic employment policies, administrative procedures, and core labor compliance policies. Our employment policies will cover both internal operational policies as well as external public interaction policies.

Staff will be trained on the company mission and core values. The policy training lasts approximately one hour and is officially completed once the employee signs the acknowledgment form. This form verifies in permanent record that they have been provided this information, given

the opportunity to ask questions, and provided access to a digital copy of the HR handbook for future reference.

Safety and Security Training

Within the first 30 days of employment, staff members will receive training with their manager and/or the head of security. This safety and security training will review safety and security protocols in the Master Safety Plan as well as the Injury and Illness Prevention Program binder. The employee will then be given a walkthrough of the facility so the manager can pinpoint the location and proper use of each exit and safety equipment. Employees will not be provided with the internal security protocols identified to prevent theft or diversion unless it is deemed necessary to the employee's responsibility and authority level. Employees will be trained on all health and safety hazards, chemical hazards, emergency response procedures, security procedures, record keeping requirements, and training requirements. The company's safety and security training is officially completed once the employee signs the acknowledgment form, which confirms the employee knows the location of exits, safety binders, and safety equipment.

All Seed to Leaf™ employees will receive annual refresher training to cover quality control procedures, product quality plans, safe usage of equipment, safe work practices, cleaning and maintenance requirements, emergency operations, food preparation, food handling, and food packaging.

Cannabis Compliance Training

Within the first two weeks of employment, each employee will receive cannabis compliance training with their manager regarding all relevant local and state cannabis regulations. This training will also cover information regarding civil, criminal, and administrative liability. Further, this training will include all regulations that govern the operation of the facility as well as any key partners or collaborators, such as distributorships, retailers, and cultivators. Managers will identify best practices and learn their importance. Additionally, managers will explain the track-and-trace system and identify how we prevent the illegal diversion of cannabis products. Staff will be provided with training and procedures for refusing access, sales, and service to minors; procedures for checking legally acceptable forms of identification; incident reporting; and law enforcement liaison policies. Once the compliance training is completed, staff will sign an acknowledgment form to document that the training was delivered and that the employee agrees to conduct themselves in compliance with all state and local regulations at all times.

Role-Specific Training

All employees will learn the what, how, and why of their work processes directly from their manager and peers. During the beginning phases of employment, the new staff will shadow fellow employees and will read the standard operating procedures and company policies before performing these tasks, which they will first do under observation of a manager. The manager will

provide supportive guidance and offer corrections as needed until the employee demonstrates two continuous weeks free of errors or corrective actions. If the employee reaches the 90th day of employment and still fails to perform to standards, their employment will be considered for termination as an unsuccessful training period. If the employee successfully completes their training, they will receive a 90-day review and be removed from probationary status.

[CONFIDENTIAL - PLEASE REDACT FROM PUBLIC RECORD]

Operational Security Measures

[REDACTED]

[REDACTED]

Premises Management

[REDACTED]

Points of Ingress and Egress

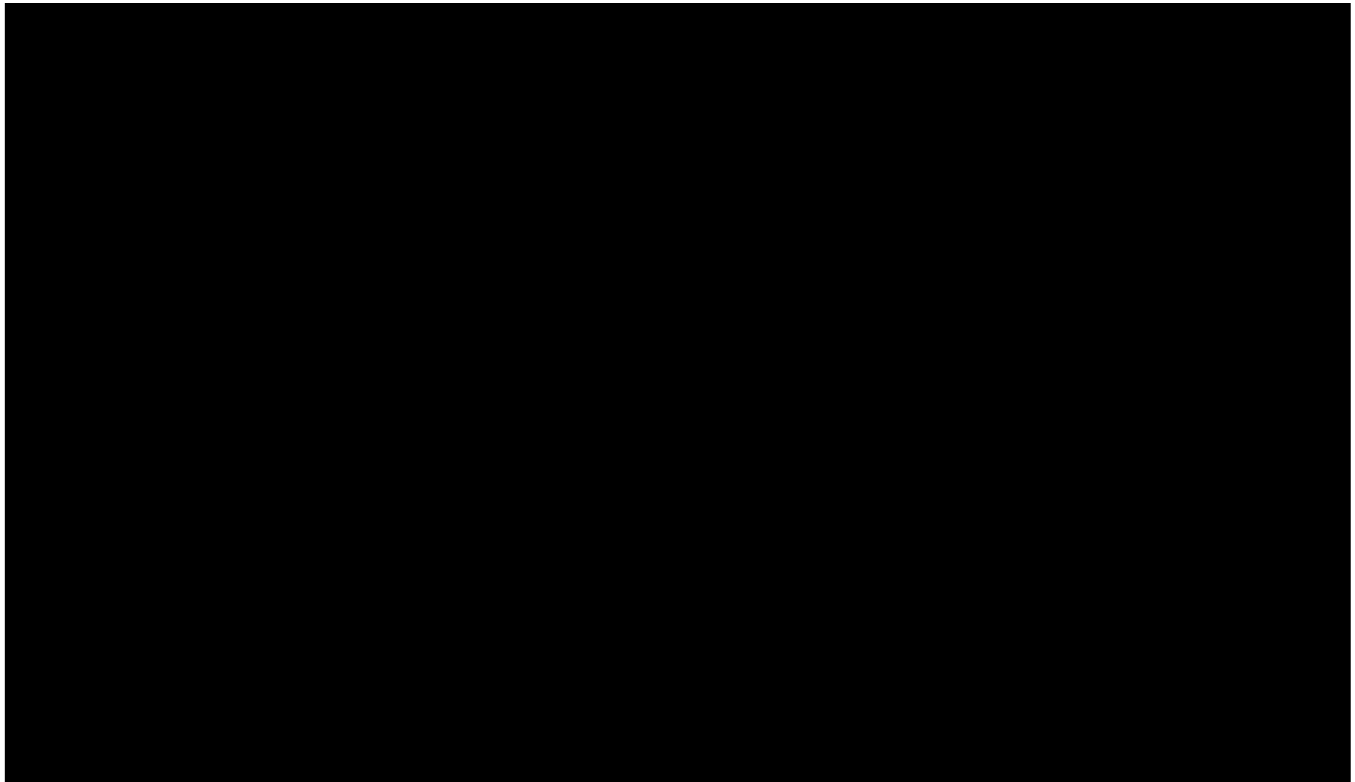
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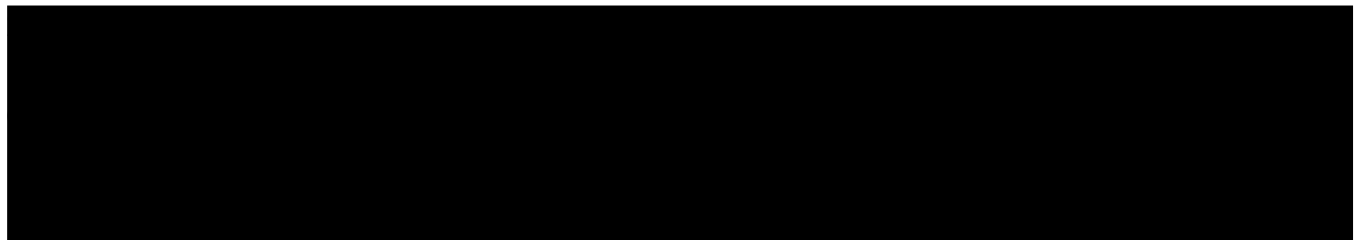
Locks



Security Video Surveillance



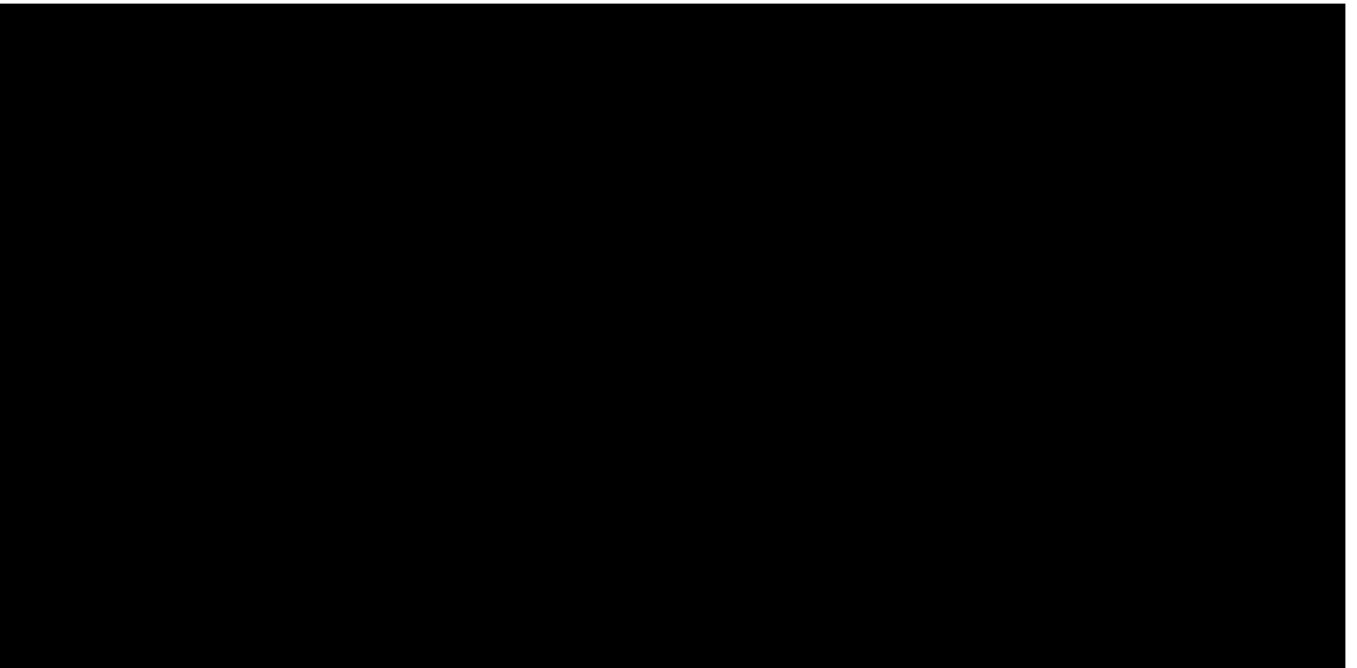
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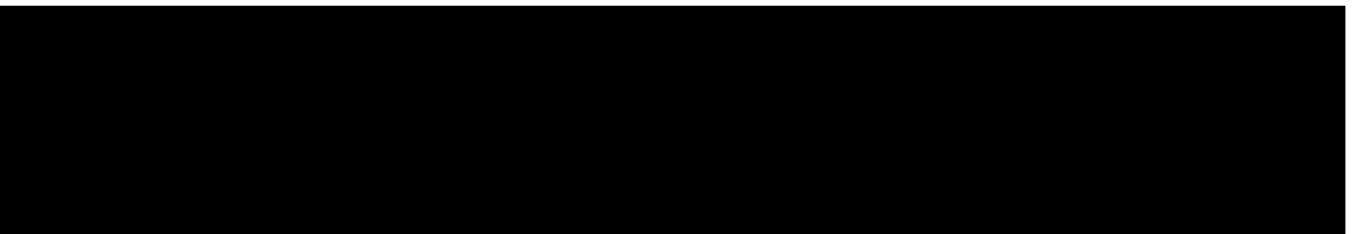
Alarm System



Secure Storage

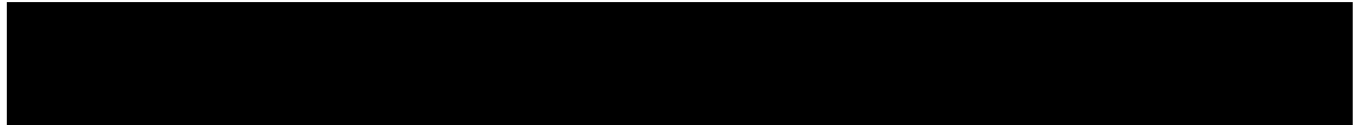


Transportation

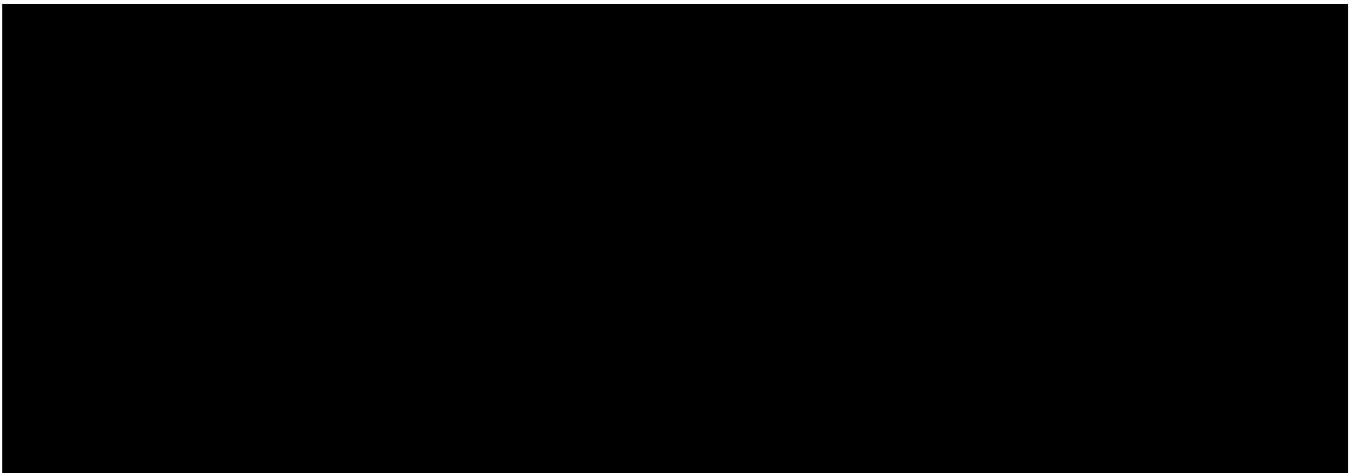




Emergency Access



Notification of Theft, Loss, or Diversion



Attachment A

Community Benefits Report



Seed to Leaf

Community Benefits Report

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Introduction

This Community Benefits Report, provided by Seed to Leaf, is intended to express our intent and interest in bettering our community within the neighborhood in which we operate and Sebastopol as a whole. We have reached out to our communities and local nonprofits to gain insight into the ideals and concerns of our neighbors and the broader community. With feedback from our neighborhood, and through mindful planning paired with our own organization's mission and values, we have devised the Community Participation Program provided below.

This program includes a specific plan for working with local organizations and nonprofits to address important health-related issues facing our community. Our plan includes the creation of a community farm in which Seed to Leaf and partnering local nonprofits will foster educational programs for locals to learn sustainable herb, vegetable, and other plant-growing practices. We are prepared to train others in the art and benefits of composting as well as multiple ways to fortify plants with non-toxic fertilizer and nourishment while protecting the crop with non-toxic pest control methods. Additionally, the Seed to Leaf community farm provides educational and therapeutic programs for those affected by opioid addiction. Currently recognized as “horticulture therapy”, the healing benefits of reconnecting to the earth, planting seeds as a way of confirming hope in the future, nourishing the earth as a way of healing the self, and receiving in return a deepened sense of peace and tranquillity has well been documented.

In addition to our Community Participation Program, in consultation with community stakeholders, we've devised our diverse and inclusive hiring practices, enclosed below, as well as our commitments to environmentally conscious operations.

Finally, we've developed and included here our Good Neighbor Policy, which ensures our team commitment toward maintaining healthy and productive relations with our neighbors and the greater community. Each initiative is an important community benefit on its own and is even more impactful when provided together.

Proactive Community Relations

The Seed to Leaf team knows that creating a positive relationship with our local community is paramount to the health of our business. In order to create those important ties to our neighborhood and beyond, Seed to Leaf will collaborate with locals and invest time and resources into proactively reaching out. We are committed to developing these positive relationships and maintaining a productive dialogue with our neighbors and community members.

Collaboration with Neighbors

Seed to Leaf has dedicated time and resources to canvassing and connecting with our neighboring business owners and residents in order to create meaningful relationships and build rapport. We listened and considered the input of neighbors, and we are working to ensure that the hopes and concerns brought forth from these stakeholders are addressed and followed up with. Moving forward into our permit application process and beyond, we will continue to check in with the members of our community to make certain we are making the health and vibrancy of our neighborhood a top priority. We plan to be an active, positive participant in our neighborhood and look forward to working alongside all our neighbors in beautifying and improving the community in which we live and operate.

Community Participation Program

At Seed to Leaf, we fully acknowledge that the legal cannabis industry is uniquely positioned to make positive changes in the communities in which we all operate. Though we have yet to be awarded a license, in collaboration with neighbors and the Sebastopol community, we have already begun to formulate our community giving program. Once we do obtain a license and are fully operational, we pledge to dedicate 5% net proceeds to the greater good, as well as staff time to charitable causes in and around Sebastopol in a number of ways including the financial contributions needed to set up, supply, track and maintain our community garden as well as train staff to voluntarily facilitate the education of those enrolled in our community garden.

Our aim with the completed Community Participation Program is to work with existing local nonprofits to create and foster education programs through our financial contributions, and to assist in maintaining those programs by incentivizing our staff to volunteer and participate with these nonprofits and on these programs frequently.

Overall, we simply believe in the philosophy of being the change we want to see. With that in mind, we pledge to be an active participant for making a positive change for our community.

Working Directly With Community Organizations

Seed to Leaf is devoted to working with the local community directly and through local organizations. We know that we have the potential to constructively benefit and contribute to communities throughout Sonoma County, and especially here in Sebastopol.

As part of our Community Participation Program, Seed to Leaf will be donating both our staff time and money to local nonprofits such as Daily Acts as well as creating a local farm for multiple community-driven purposes. In fact, we've already acquired farm land for this very purpose and look forward to the partnerships to be fostered in bettering our community.

Daily Acts

Our goal in working with Daily Acts is to create an educational program whereby local children can learn sustainable farming practices with herbs, vegetables, and other plants on our community farm. We agree wholeheartedly with the mission of Daily Acts (dailyacts.org): “to transform our communities through inspired action and education, which builds leadership and local self-reliance.” We, like Daily Acts, are grounded in the core belief that every choice we make matters, and we take a heart-centered approach to personal and community transformation. For that reason, Seed to Leaf aims to aid in our efforts to create and empower our community through “education programs, action campaigns, and strategic alliances to connect people to each other and to their own power to grow food, conserve resources and build local resilience.”

Assisting Communities Affected by Addiction

As we all know too well, there is an opioid-addiction crisis in the United States. At Seed to Leaf, we feel a responsibility to do what we can to help combat this critical epidemic affecting our communities. Opioids are often prescribed to relieve patients of pain and discomfort caused by a variety of ailments and afflictions. Those with chronic illnesses are generally anticipating long-term, if not lifetime, opioid use.

Opioid use does dull pain, but it also negatively affects the brain, respiratory system, nervous system, the liver, and more. Unfortunately, once a person’s body becomes physically dependent on opioids in order to feel “normal,” addiction is often present and physical damage is already being done. What’s more, many people prescribed opiates often cannot afford the expensive drugs long-term and turn to less expensive street drugs, such as heroin, to supplement their opioid prescriptions.

At Seed to Leaf, it is our belief that as a cannabis organization we have a special opportunity to aid communities that have been impacted by opioid addiction, and we look forward to working alongside and contributing to local organizations that will make a positive difference on their behalf. In addition, we plan on taking direct action by partnering with local nonprofits to utilize our farm as a resource for wellness among those affected by addiction within the community. In line with using our community culinary herb farm for community education, we aim to create a program whereby those affected by addiction and are in recovery can take part in an educational program learning and contributing to these same sustainable growing practices. It would serve as both a work program, as well as nature-connecting therapy, where those participants may grow culinary herbs, learn how herbs can positively impact health, and connect with nature while learning a useful skill.

We at Seed to Leaf are part of the growing body that believes cannabis and Cannabidiol (CBD) can treat opioid addiction and replace traditional pharmaceutical pain killers. We have an opportunity to make a positive impact on this crisis through education and providing CBD products as this alternative. We aim to develop materials which will inform readers about the dangers of opioid use

and the alternative that can be found in cannabis. We will detail the conditions that can typically be alleviated with cannabis and CBD, and make an effort to reach out to groups that are on the ground floor with those struggling with addiction.

Diverse and Inclusive Hiring Practices

Prioritizing diversity and inclusivity in hiring practices are staples for any successful business. Sebastopol cherishes its diverse values and we aspire to be the same as an organization through our hiring practices. We pledge to create an employee roster that is diverse and inclusive.

The strength of our diversity makes our business stronger. As an organization, we will benefit from a variety of useful perspectives by being inclusive of all people, regardless of skin color, gender, sexual preference, or religious beliefs. Our employees' diverse perspectives and varying viewpoints affords us the valuable opportunity to better address concerns, problem-solve, and be even more innovative in our practice and toward bettering our community.

Health-Focused & Experienced Leadership

At Seed to Leaf, the team is made up of health-conscious individuals who are committed to ensuring that the cannabis industry fulfills its great potential for improving individuals' health, fostering our local economy, promoting environmentally-friendly businesses, and furthering community education causes that are near and dear to our hearts.

Nayeli Rivera

Nayeli was born to Mexican parents who immigrated to Sebastopol, CA, in 1976. She was born and raised in Petaluma alongside her three brothers. Her family were pioneers of the Latino Community in Sonoma County. Her father, an immigration counselor, took Nayeli under his wing where she started volunteering and marching for justice and equality for all. She would help him with translations and appointments with his clients at even an early age. This led to her working as an interpreter at the U.S. Citizen and Immigration Services office in San Francisco. There she practiced compassion and humility when providing her services. Most of the time her services were on a donation basis as many of her clients were low income families. From there she worked as an interpreter with the Sonoma County office of Education supporting the Deaf & Hard of Hearing program. She accompanied families to doctor's appointments and offered her services beyond interpreting. Many of the families were new to the country and had no support. She would routinely go above and beyond to help these families overcome many obstacles and hardships. In 2010 she moved on to working in the wine industry through her family's business as farm labor contractors in Napa County. While there she quickly gained business experience and was able to make her mark in a predominately male-run industry. Her desire to continue to grow and learn in business started there and continues to bloom.

Nayeli had a son while in high school but not only managed to graduate with honors, she received a full ride scholarship to Sonoma State University. She married her husband, Nathan, in 2009 and

together they had two more children growing up in Santa Rosa. In 2016 Nayeli and Nathan opened a premier plant-based organic restaurant in Santa Rosa, CA, and continue to support the healthy living movement. Today they raise their family together in Sebastopol, CA.

Her business philosophy includes creating opportunity for women and people of color so that together our community can thrive. Breaking the stigma associated with cannabis in the Latino community as well as breaking the glass ceiling is part of Nayeli's passion.

421 Group

Our Seed to Leaf team is supported by the experienced individuals at 421 Group. They possess several decades of combined experience in the cannabis industry. They help ensure that our operations are in complete compliance with the ever-changing regulations and will assist us in being an innovative, community-driven addition to the vibrant landscape of Downtown Sebastopol.

Environmentally Conscious

Protecting the environment is at the core of Seed to Leaf. We can either hurt or help our environment with our everyday actions, and we are committed to making sure we limit our carbon footprint, use of electricity, and our water consumption as much as possible. We hope that in doing so we match and raise the bar for other cannabis companies in Sebastopol and beyond to take stock of their environmental outlook and make changes as needed.

Seed to Leaf is committed to energy conservation and environmental stewardship. Therefore, we have adopted sustainable practices created specifically for our operation.

Seed to Leaf's sustainable practices include five basic tenets: General, Energy, Water, Solid Waste, and Pollution Prevention. Each of these principles is equally important to our commitment to energy conservation. For each of these tenets, we will be assigning a person to monitor water, energy, and waste bills to identify spikes in usage, ensuring that all power electronic management systems are activated, arranging the workspace to benefit from natural light, and setting the thermostat to 76° for cooling and 68° for heating.

Seed to Leaf will only use dry methods to clean outdoor surfaces. We will assign a person to complete quarterly waste audits during which they will be identifying items that can be donated, reused, recycled, and composted. We will also divert all non-landfill materials from the waste stream.

Our commitment to sustainable practices is paramount to Seed to Leaf when planning our operation. We are pleased to contribute positively to the community in this way and help to further set a standard for environmental stewardship in the cannabis industry.

Good Neighbor Policy

Seed to Leaf holds the belief that in order to prosper, we must be connected and respectful to our neighbors. By proactively addressing neighborhood concerns and contributing positively to our community, we know that our organization will prosper. For that purpose, we have a community liaison on staff who is always prepared to address any hopes, fears, or concerns that a neighbor may have. This community liaison will introduce themselves and provide contact information to our neighbors and maintain open communication with them in order to solicit their feedback on our operations.

Community Liaison

Community Liaison: Nayeli Rivera

Contact Cell Number: 707-582-0432

Contact Email: riverafarms@gmail.com

In the spirit of being a good neighbor, Seed to Leaf has established and will continue to develop our Good Neighbor Policy. This policy currently states:

1. We will offer neighbors the direct contact for this staff member who will be responsible for prompt replies on the next business day.
2. We will work to address these concerns directly and without having to involve city and county staff.
3. We will perennially check in with our direct neighbors to make sure that any concerns about our operation or ideas for its improvement are heard, as well we will report back to them on what we have done to address these concerns and ideas.
4. We will work to maintain and clean the roads leading to our property to help ensure that it is safe for both ourselves and our neighbors.
5. We will not engage in activities that may disturb the neighbors.
6. We will drive safely in and around the property.
7. We will be polite to our neighbors and their guests.
8. We will work to keep our parking area litter free around our location in order to support great neighbor relations.
9. Considering that we are in a commercial center, we will conduct standard business efforts that can impact neighbors, such as conducting deliveries and exterior maintenance, during normal extended business hours, from 6am to 9pm, but not between the hours of 9pm and 6am.
10. We will treat our property and the neighboring properties with reverence and respect.

This Good Neighbor Policy may be amended to address any neighborhood hopes or concerns as they arise in the future.

Conclusion

At Seed to Leaf, we've worked hard to ensure that we're the best candidate for this permit and for this community. We hope to inspire other cannabis businesses to follow suit and elevate the cannabis community as well as the communities in which we all operate.

Considering our robust Community Participation Program, our intent to practice Diverse and Inclusive Hiring Practices, our commitment to upholding our Good Neighbor Policy, and to act in accordance with our Environmentally Conscious values, we are dedicated as an organization to being a beneficial force in our neighborhood and for the city of Sebastopol.

Attachment C

Odor Control Plan



ODOR MITIGATION PLAN

Seed to Leaf, Inc
400 Morris Street Suite A & J, Sebastopol CA

Abstract

The following plan has been developed to comply with City of Sebastopol Title-17, Chapter 360.070(H) Odor Control (Cannabis) requirements.



WARNER MECHANICAL ENGINEERING, INC.

JEFF WARNER, PE | EMAIL: jwarner@wme-consulting.com | PHONE: 707-322-0676



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Introduction

The following plan has been developed to comply with City of Sebastopol Title-17, Chapter 360.070(H) Odor Control (Cannabis) requirements.

This plan has been developed based on the applicant's proposed operational criteria as outlined in the general application. Administrative, operational and engineering controls noted are consistent with the commonly accepted best available cannabis-industry-specific technologies designed to mitigate cannabis odors.

Successful application of this plan will effectively mitigate cannabis odor detection outside the structure in which the proposed business is to operate.

Project Details

Please refer to the project summary included in the general application for an overview of proposed project details.

Type-6 (level-1) Manufacturing: license allows a licensee to engage in non-volatile solvent and mechanical extraction (ex: CO₂, ethanol, water, or food-grade dry ice, cooking oils or butter), as specified in the application. Odor sources and intensity by cannabis activity are noted below. Refer to **Engineering Controls** (below) for mechanical system details.

Handling of cannabis, including grinding of dried flower material (AKA bio-mass); and loading/unloading of extraction equipment, emits moderate and intermittent cannabis odors. Due to the intermittent nature and safety ventilation systems associated with these activities additional mechanical systems including carbon filtration are not necessary to mitigate odors.

Bulk flower material stored (not in air-tight packaging) emits moderate and persistent cannabis odors.

Flower material stored in air-tight packaging does not emit noticeable cannabis odors and therefor mechanical systems are not necessary.

On-site consumption through incineration (smoking and vaping) will not be permitted. This plan does not address incineration related odors.

Engineering Controls

Mechanical plans developed for building permit application will include the following features and capabilities:



1. Significant and persistent odors: environmental exhaust systems with in-line carbon filtration will be utilized to mitigate persistent odor sources.
2. Moderate and intermittent or persistent odors: recirculation systems with in-line carbon filtration will be utilized to mitigate odor sources. Extraction and post processing activities located in areas with safety ventilation systems do not require exhaust air stream filtration: exhaust air rates and discharge velocities/orientations will provide a high degree of dilution.
3. Carbon filter(s) will be specified to maintain an acceptable contact time for cannabis odor exhaust and recirculation air stream(s).
4. Exhaust air inlets will be located in areas of the facility where odor generating processes occur.
5. Odors will be contained within the building through system air balancing techniques to eliminate uncontrolled exfiltration of odor to the outdoor environment.
6. Filtered exhaust air streams that are part of the odor mitigation system will be released to the environment in an upward discharge pattern.
8. Environmental exhaust fans in non-cannabis odor intensive areas (break room, rest room, etc.) will not be filtered.
9. System testing and balancing will be required of the installing contractor to demonstrate air balancing effectiveness.
10. Filters, fans and other components integral to the odor mitigation plan shall be clearly labeled in accordance with the plans.
11. Contractor shall provide a test and balance report to the applicant including: initial carbon filter differential pressure measurements; outdoor air rates at space conditioning and make-up air equipment; and environmental exhaust rates.
12. Installing contractor shall provide written monitoring instructions and provide operational training to the applicant upon placing the system in service.
13. Contractor operational training shall be the basis for routine maintenance and testing standard operating procedures.
14. Construction administration services provided by a licensed mechanical engineer are required to verify the installation is consistent with this plan, including review of test and balance report.



Operational Processes and Maintenance Plan

Detailed operational and maintenance plans should be developed by the applicant. The following items should be included for odor mitigation purposes:

1. Routine verification of odor mitigation effectiveness through inspection of odors in the general vicinity of the building.
2. Routine monitoring of exhaust system carbon filter differential static pressure to verify filter condition/effectiveness.

Filter replacement is required any time monitoring yields unacceptable pressure monitoring results.

Staff Training

Standard operating procedures, including staff training, should be developed by the applicant. The following items should be included for odor mitigation purposes:

1. Routine verification of odor mitigation effectiveness monitoring: It should be clear who is responsible for this activity, where and how data is collected and cataloged. A map with clearly indicated data collection test points should be available for reference. Testing should be conducted while processing is occurring and exhaust systems are active. Testing should occur both in the morning (when winds are calm); and in the afternoons (when winds are typically greater). Results should be recorded in a log and should include: operator name, time of day, date, results by test location, relative wind speed and weather conditions.
2. Reporting of cannabis odors outside the building: It should be clear what an employee is to do in the event cannabis odors are detected outside the building. The General Manager or other supervisor should be notified immediately upon detection. The person responsible for receiving notifications should take immediate steps to remedy the problem including, but not limited to, notifying service personnel for repairs or routine maintenance. If odors persist, odor producing operations should be stopped until an effective solution can be implemented.
3. Odor mitigation effectiveness monitoring training: All employees should be trained to conduct odor mitigation effectiveness tests. Training procedures should be included in readily available employee handbooks for reference.
4. Routine carbon filter testing: It should be clear who is responsible for this



activity, where, and how data is collected. Carbon filter differential pressure measurements should be collected on a weekly basis. Results should be recorded in a log for each filter and should include: operator name, values, date and time. A map with clearly indicated data collection test points should be available for reference. Testing should be conducted while processing is occurring and exhaust systems are active. Results within 20% of the manufacturer's recommended values should be reported to the maintenance team immediately.

5. Replacing carbon filters: Filters should be replaced immediately as pressure differential measurements exceed routine carbon filter testing limits (see item 4 above). The maintenance team should be trained to perform this task. Training procedures should be included in readily available employee handbooks for reference. Filter replacement dates should be recorded in a service log including operator name, date, initial and final pressure readings. Replacement filters should be kept on-site at all times.

Mechanical Design Considerations

Carbon filtration is commonly accepted throughout the cannabis industry as the current best engineering control technology for mitigating odors. Odors are generally captured by locating exhaust air/filter intake points in areas of the facility where odor generating activities or raw material product (flower) handling is expected; in conjunction with the implementation of common air balancing techniques. Air balancing effectively eliminates uncontrolled exfiltration of cannabis odors to the exterior of the building.

Additional systems include combination recirculation fan/filtration systems. Recirculation systems are often applied where moderate odor sources are expected. Recirculation equipment may be fans with passive carbon filters or powered electric air purification units.

Carbon filtration odor removal effectiveness depends on three criteria:

1. Exhaust air contact time
2. Filter cleanliness
3. Containment

Contact time is a function of air velocity through the filter and filter surface area. The contact time should be designed to meet or exceed the filter manufacturer's specified minimum. Filter effectiveness decreases with decreased contact time and odors are passed through the filter to the environment.

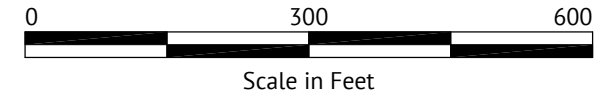
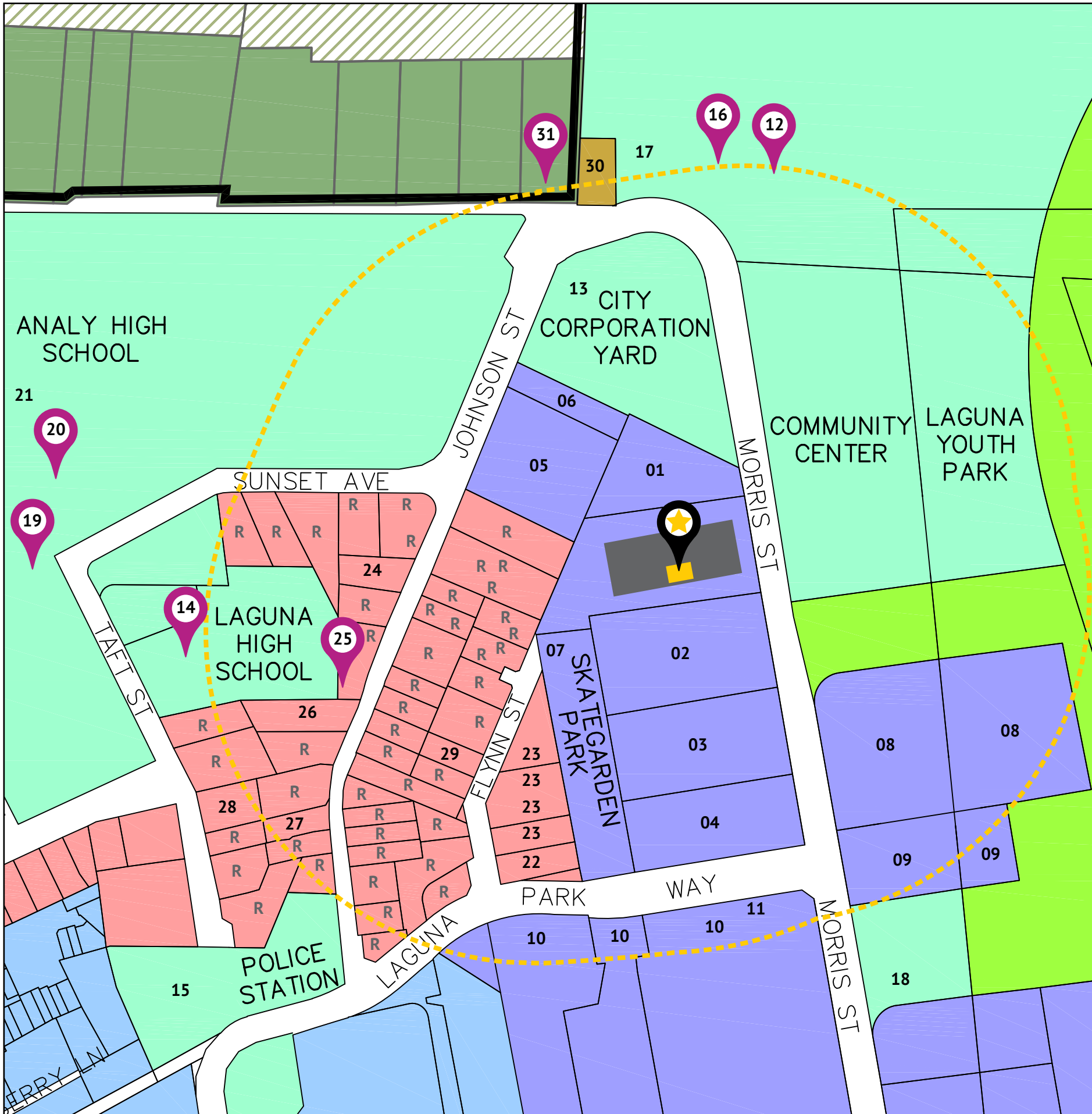


Filter cleanliness can be quantified by monitoring system pressure drop across the filter and should not exceed a manufacturer's published performance rating for a given filter. This measurement quantifies the degree to which the filter media has been occluded (becomes dirty). As a filter becomes occluded the pressure drop increases and the fan exhaust rate is reduced. Reductions in the exhaust rate change the air balance and can lead to exfiltration of odor.

Containment is achieved through common air balancing techniques. Proper air balancing allows for negatively pressurizing a room (removing more air than is mechanically supplied) and insures odors pass through filters, eliminating the exfiltration of odors to the environment or to adjacent rooms through random openings in the building (cracks, doors, etc.). These techniques are commonly and successfully implemented in many non-cannabis applications to eliminate the migration of odors to other part of the building, including commercial kitchen and rest room applications.

Attachment D

Neighborhood Context Map



Address

- ★ 400 Morris St. Suite A, Sebastopol, CA
- 600' Set Back from Property Line

Schools

- 31. Greenacre Homes & School
- 14. Laguna High School
- 19. Wscuhd Community Day School
- 20. Analy High School
- 25. West Sonoma County Union High School

Youth Centers

- 12. Sebastopol Community Cultural Center
- 16. Community Cultural Center Youth Annex

Day Care Centers

None

Dispensaries & Smoke Shops

None

Districts

	RA	Residential Agricultural
	RD	Duplex Residential
	RR	Rural Residential
	CD	Downtown Core
	M	Industrial
	CF	Community Facilities
	W	Primary Wetlands District

Attachment E

Canvassing Report



Canvassing Report

400 Morris St., Sebastopol, CA 95472

Purpose

At Seed to Leaf, we believe that a huge factor in our success as a business depends on the health and success of our community. That's why we've made it an express goal to get to know our neighbors as best as we can, and to show that we are committed to being an active, positive influence in the betterment of the area.

Before we were operational as a manufacturer, we walked around to our neighbors and introduced ourselves. These neighboring businesses include:

- Key Auto Body
- KLR Machines
- Rhyne Design
- Naturlich Flooring
- Pisces Productions
- Digital Media Vending International, LLC
- Coaches Corner
- Solar Works

Many of these businesses showed genuine support and curiosity about our industry and the work that we do. We're looking forward to getting to know our community members more, and to learn more about how we can best support them.

We are very excited to be part of this community and to build Seed to Leaf into a proud leader of the Sebastopol area. To convey our outreach efforts, we've provided a Canvassing Map on the next page that depicts where we've conducted outreach to our neighbors.

Canvassing Map



Attachment F

Site Photographs

Site Photographs

Seed to Leaf | Cannabis Us: Processing



Attachment G

Location Map



SUNSET AVE

JOHNSON STREET

400 Morris St.

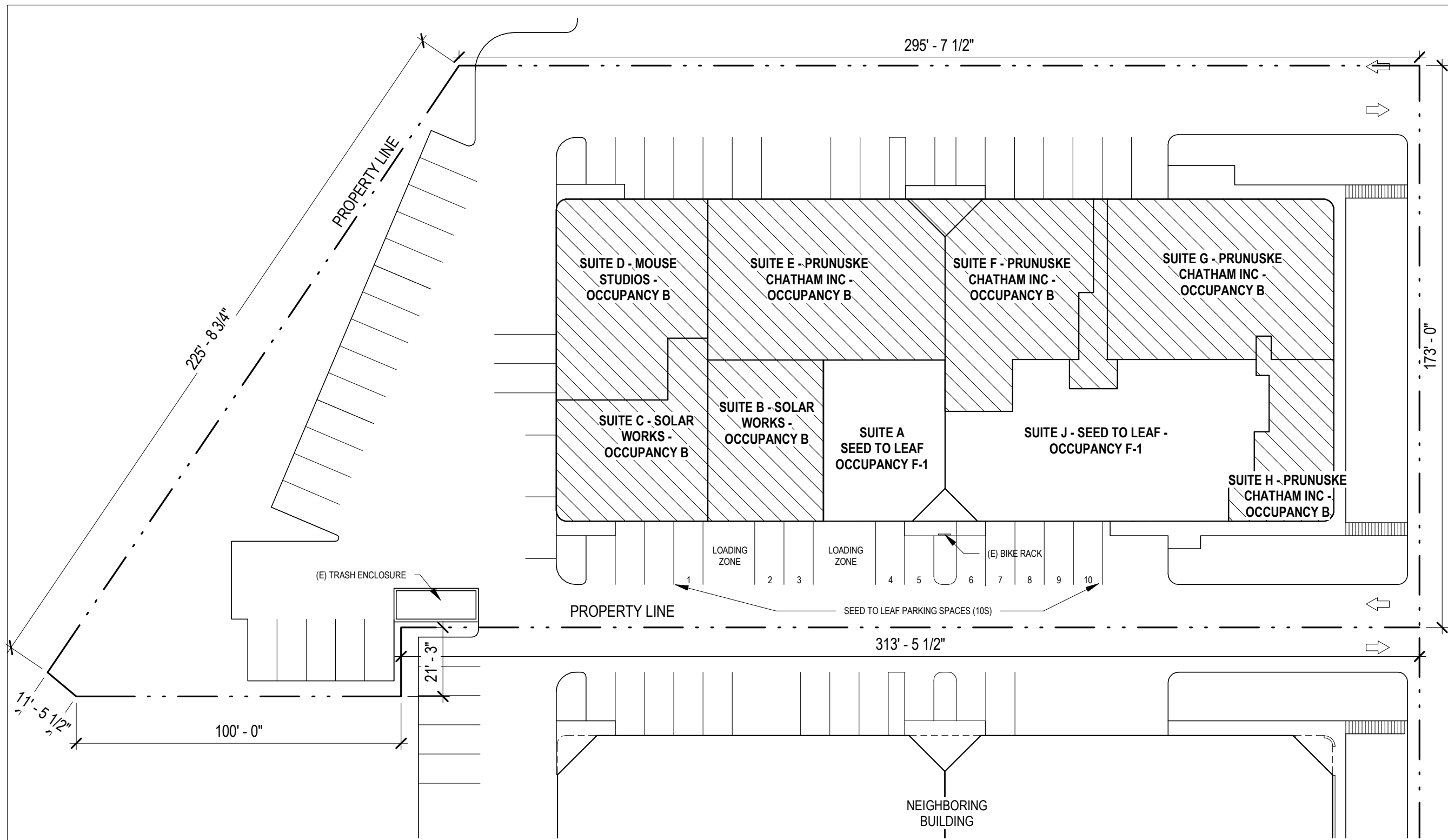
MORRIS STREET

0 100 200 300 feet



Attachment H

Floor Plan and Site Plan



SITE PLAN - OVERALL

1/32" = 1'-0"

ARCHITECT

TNLDB TNLDB
 1100 Jackson St, #15
 San Francisco, CA 94133
 415.260.1139

PROJECT TITLE
SEED TO LEAF INFUSION ROOM

CLIENT
SEED TO LEAF

ADDRESS
**400 MORRIS ST, SUITE A, J
 SEBASTOPOL, CA 95472**

PROJECT NO. 20011	SCALE 1/32" = 1'-0"
----------------------	------------------------

SHEET TITLE

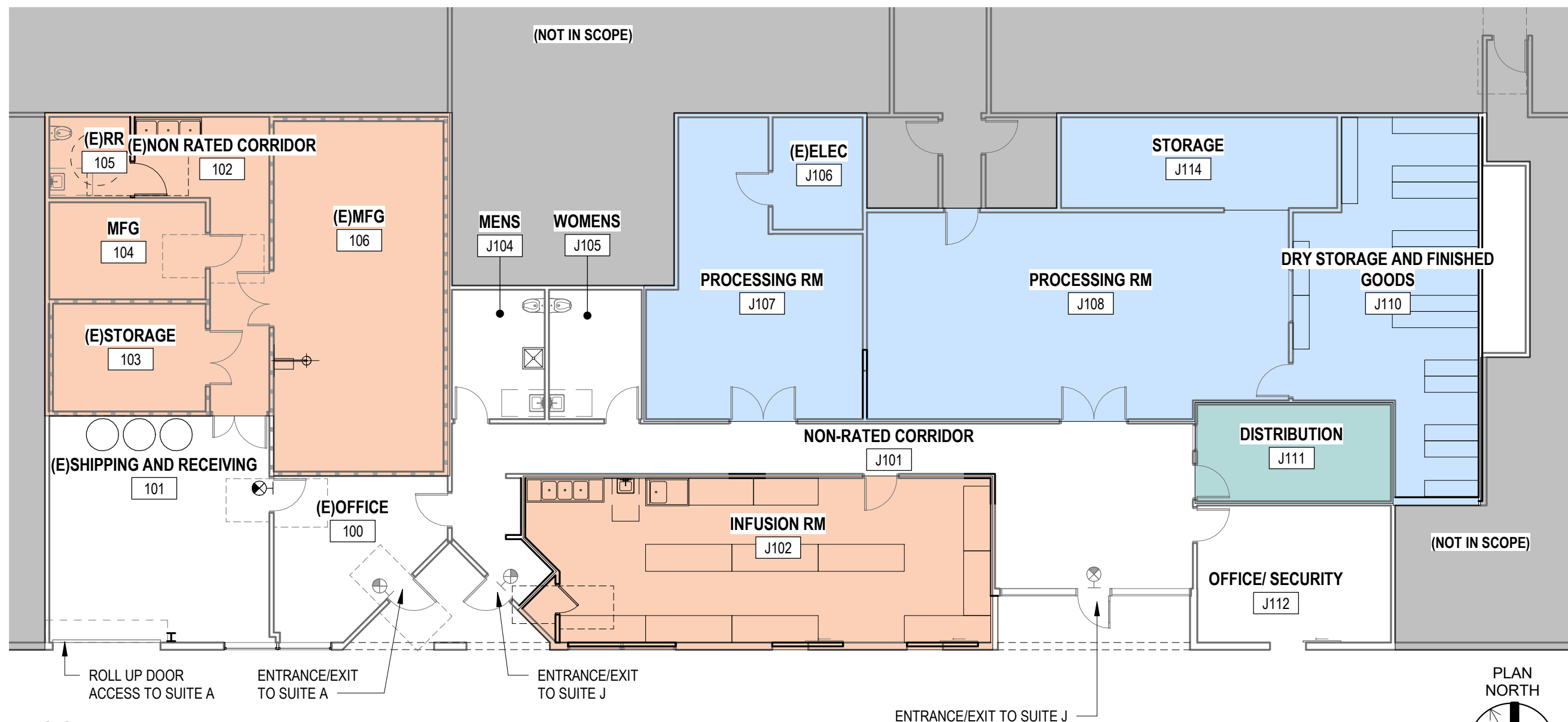
SITE PLAN

DRAWING NO.

SK100

ARCHITECT

TNLDB TNLDB
1100 Jackson St, #15
San Francisco, CA 94133
415.260.1139



PROJECT TITLE
SEED TO LEAF INFUSION ROOM

CLIENT
SEED TO LEAF
ADDRESS
400 MORRIS ST, SUITE A, J
SEBASTOPOL, CA 95472

PROJECT NO. 20011	SCALE As indicated
SHEET TITLE	

FLOOR PLAN

DRAWING NO.

SK101

Response to Questions from the Planning Department



400 Morris Street Suite A & J

QUESTION #1: For the distribution portion of it will it be self-distribution of just the products that are made on site, or will it include distribution of other manufacturing companies?

ANSWER: The goal of acquiring this distribution license is to be able to move Seed to Leaf products and cannabis material freely throughout our facility as well as our external network. The distribution use will serve to transport our products manufactured at the facility to dispensaries and testing laboratories. This use will also serve to move plant material from cultivators to our processing site in Suite J. Because space is limited in Suite J, we intend to do minimal trimming services for cultivators. We don't currently plan to transport third party products to dispensaries that have not first gone through our processing use, however in the constantly changing cannabis industry we don't want to rule that out.

QUESTION #2: Do you have an estimate for how many trips will be generated for the distribution portion as it will help us understand on how much extra traffic could be incurred?

ANSWER: Because the primary function of distribution is to serve manufacturing and processing, the deliveries will be mostly bulk, long distance hauls. During our peak season, at most there will be two to three shipments per week. If in the future we distribute finished goods, the small footprint of our distribution space would only support a limited, curated catalog, necessitating up to one delivery per weekday maximum.

QUESTION #3: Will there be self-dedicated delivery trucks/vehicles and if so, how will they be secured while loading and unloading?

ANSWER: Yes, there will be one self-dedicated delivery vehicle. The vehicle will pull into the shipping and receiving area through the roll-up access door in Suite A. The vehicle will be turned off and secured by closing and locking the roll-up door after docking in the shipping and receiving area. There are strict security protocols in place to ensure safety and efficiency of this process that we currently utilize when external distributors arrive and depart from Suite A. Integrated distribution will allow us to control this access even more tightly.

QUESTION #4: Will the distribution center be operated out of the small office space allotted on the floor plan or will it be processed through the existing shipping and receiving sally port?

ANSWER: The distribution use will operate out of the office space (noted as J111 in the floor plan). Products and plant materials will be unloaded from the vehicle in the common use shipping and receiving area (101) and move through common office (100) and the non-rated corridor (J101) until they ultimately reach room the distribution footprint in J111, where they will be logged into METRC, tracked, and stored according to state protocols.

QUESTION #5: What is the path of travel for the product as it goes through the facility?

ANSWER:

Receiving material

- Shipping and receiving (101) → Office (100) → Non-rated corridor (J101) → Distribution (J111)

Sending material

- Distribution (J111) → Non-rated corridor (J101) → Office (100) → Shipping and receiving (101)

Note: After a product or plant material has been checked into the Distribution area, it can be transferred to the manufacturing or processing uses within the facility through the common use corridors. Each of these transfers will be logged into METRC using a transfer manifest, as required by state regulations. Transfer manifests are required to be printed and stored in a lockable filing cabinet, accessible to compliance oversight by authorized governing bodies.