

PROJECT NARRATIVE

Overview

The Applicant JAC Industries llc is applying for a Cultivation, Distribution, Manufacturing Nursery Licenses at Colusa CA. Said property consists of a phased buildout. Phase one will include 2 metal buildings with approx. 5000 flowering lights. Phase One will be situated on approximately 27 acres of M zoned land located in the County of Colusa . The current property owner approves the potential usage of the property.

Team

Robert Dubar

Robert Dubar was in the restaurant franchising business for over 20 years, with over a dozen El Pollo Loco locations under his ownership at a point in time. Since selling his franchised locations, Robert has consulted and advised for various industries including store front retailers, restaurants, real estate, and construction services. Robert currently resides in Incline Village, Nevada.

Anna Willey

Anna Willey is the Chief Executive Officer and owner of CAM Corp & Dash Industries, a Recreational Cannabis corporation with annual revenues exceeding \$50 million since June 2009. The company encompassed 2 large-scale commercial grows in Sacramento, CA with 2 additional locations and grow locations scheduled for 2021.

Anna Willey is a veteran of the cannabis industry, with over 17 yrs. of experience in all aspects of producing, cultivation and dispensing of cannabis in California.

Her extensive experience, collaborative leadership style, and operational expertise positions her as a competent CEO for growth. Before starting CAM, Anna Willey worked as a PMP certified Project Manager/ IT Consultant in the software field working for companies such as Computer Associates, SAP and Watson Wyatt and Accenture.

Josh Granville

Joshua Granville is a cannabis cultivation consultant from Cincinnati Ohio. After completing a business economics degree from the University of Cincinnati he entered the cannabis industry in Denver Colorado.

When California approved recreational use cannabis in 2016, he moved to Southern California to integrate large scale commercial cannabis with technology and systems from traditional agriculture.

Currently operating or consulting on 100k sq foot of canopy in the California recreational market. Robert Dubar is the largest investor for JAC Industries LLC and owns 53 percent of the entity. Robert Dubar is also the property owner Courtney Dubar's father.

. Anna Willey is the managing partner and CEO for JAC Industries LLC.

Joshua is the COO and 23% holder in JAC Industries LLC.

Employment

JAC Industries estimates to provide approximately 250 job for building 1 ; 200 additional jobs will be created for Building 2 if project receives an electrical upgrade (working in conjunction with PG& E) State Local Licenses, Fire inspection, COO and tax Development Plan.

Projected Number of Employees (FTE) for Building 1:

Cultivation: 130

Nursery: 10

Compliance: 10

Distribution: 50

Ancillary (Office, Security, Facility Maintenance) : 50

Projected Revenue

Phase 1: 70-90M

Phase 2 :110M – 140M

Combined estimated revenue could reach 180 M – 220 M

Requested Entitlement

The subject property, 82 acres is ideally located in an agricultural area and is fully approved for CEQA from the city of Colusa ; adjacent and nearby property uses are industrial in nature. There are no parks, schools, daycares, or youth centers within 600 feet of the subject property. Building 1 is scheduled for 116K SQ FT and Building 2 would be approx.. 218 K SQ FT.

Exterior Work

JAC Industries plans to build 2 146K SQ foot buildings over the course of 2- 5 years. The Applicant is also not requesting signage and understands that any exterior signage will require appropriate approvals from the Building Division.

Interior Work

Between 2 buildings will be remodeled to include the following

- 50 Flowering rooms
- 4 Large vegetation room
- 10 Dry Room
- 4 Safe Room
- 4 Trim and Storage Area
- ADA compliant bathrooms and work areas for trimming, drying and curing of cannabis

Restricted Access

All cannabis cultivation activities will be handled within the secured interior confines of the building. Nothing will be visible from the public-right away or street. All activities

associated with the business will occur within restricted access rooms and areas that will not be accessible by the public.

About Applicant

Applicant is a cannabis management, investment and development corporation with significant experience in the operations of cannabis related businesses. Applicant principals are already approved owners in California, currently operation multiple cultivation and retail facilities across California. They have been owners and operators of cannabis facilities in Colorado since the inception of legal cannabis in that State. Furthermore they have consulted for a wide variety of clients across the country in states that have enacted cannabis regulatory systems.

COMMUNITY RELATIONS

1. COMMUNITY RELATIONS COMMITTEE

Being a good neighbor is of paramount importance, and the Applicant will establish a Community Relations Committee (CRC) to aid in this endeavor. This CRC will be established to ensure that the community is involved in establishing and monitoring priorities, plans, and programs. The CRC will assist the Applicant in meeting its obligations by reviewing community needs, discussing strategies, recommending community benefit plans and monitoring progress towards identified goals

Community Information and Contact

The Applicant will develop a website with online information, contact information and State and local information on the cannabis information. The Applicant will designate an employee as an on-site liaison working directly with the local community's municipal offices, police chiefs, civic leaders and chambers of commerce to ensure that our organization has created a positive community experience.

2. JOBS PLAN

Overview

The Applicant will provide health care, a living wage for all 250- 400 employees. All managers and supervisors will be required to comply with all federal and state guidelines for dealing with the management of personnel. In addition to paid staff, every effort will be made to use local vendors and contractors.

Diversity Targets

The Applicant is committed to promoting and sustaining an environment of diversity, equality, fairness, inclusion and respect. To achieve a diverse workplace The Applicant will strive to hire approximately 30% of its workforce from minority candidates.

Continuation of Hiring

As with all businesses, The Applicant is expected to experience some turnover and will operate to replace jobs on a local basis prior to expanding its search. The Applicant is committed to replacing, promoting and hiring from within the employment pool in the community first.

3. DESIGNATED POINT OF CONTACT

The Applicant has assigned the role of Community Relations Manager to Ms. Anna Willey (owner). As such, she will be the designated point of contact for all community outreach and ongoing community relation's matters. She will be the main point of contact for the following:

- City Officials (including City Manager, Police, Fire and Department of Cannabis Policy and Enforcement).
- Neighboring businesses

- Ensure that an approved and qualified business official is available 24 hours a day and that responses to the community are handled appropriately in a timely manner (usually within 48 hours)

The Applicant takes its relationships with neighbors and the community at large seriously and will attempt to address all issues and concerns received in a prompt and courteous manner. Records of Such inquiries will be properly maintained.

4. SPECIFIC BEAUTIFICATION STEPS

Reducing Illegal Dumping

The Applicant understands the seriousness of illegal dumping in the neighborhood and will assist community leaders by:

- Keeping dumpsters and garbage bins locked and in secure areas.
- Keeping dumpsters away from busy streets and in well-lit areas.
- Scheduling pick up of trash in advance
- Checking The Applicant's dumpster's every day for illegal dumping.
 - If The Applicant is compromised, management will call local law enforcement.
- Help monitor the neighborhood.

Littering

The Applicant places an emphasis on a clean work environment and community. As business owners, the following will always be implemented at the Cultivation Facility.

- Trash receptacles will be provided at entrances, exits, loading docks and walkways around the Facility.
- Employees and Contractors will have access to dumpsters and will make sure they are always securely locked
- Employees will be educated as to the importance of individual responsibility for a clean and safe working environment.
- The Applicant will lend time and resources to community groups aimed at cleaning up the community.

\

SECURITY

1. FACILITY SECURITY

Overview

The Applicant will put into place robust facility security systems taking into account all facets of the Cultivation facility for the highest level of safety for employees, security for the facility and surveillance.

Perimeter Security Measures

The perimeter line of protection is the outermost line that can be protected by facility security measures. A perimeter barrier is a medium which defines the physical limits of an installation, area, building, or room; and, which restricts or impedes access thereto. The perimeter should be pushed out to the edge of sidewalks and/or property lines by means of fencing, bollards, planters or other obstacles. To push this line out even further, restricting or eliminating parking along curbs in front of the facility should be done when possible. Barriers offer important benefits to the overall physical security and will include the following:

- Controlling vehicle and pedestrian traffic flow
- Providing entry control points into the building
- Defining a “buffer zone” for sensitive/off limits areas
- Precluding visual compromise by unauthorized individuals
- Delaying forced entry

The Applicant will conduct periodic inspection and identification of needed repairs to these perimeters. Monthly maintenance and inspection will be conducted to ensure trees, bushes, and other foliage outside of the Cultivation Center premises do not allow for a person or persons to conceal themselves from sight. Grass, brush and trees will be removed as needed. Openings in perimeter barriers (windows, gates, doors, etc.,) will be kept to a minimum. All openings or entrances will be guarded or secured when not in use. Openings, such as windows or doors that are not needed or necessary for emergency exit or environmental purposes will be provided with adequate locks or be blocked or covered by screens or similar material.

Perimeter Warning Signs

A significant number of warning signs will be used around the entire perimeter of the facility to ensure that possible intruders are aware of entry into a restricted/controlled area.

Security Lighting

Security lighting provides both a real and a psychological deterrent to criminal activity and will be used to surround the entire Cultivation Center. Security lighting helps a guard detect intruders and is desirable for sensitive areas such as exterior doors, loading docks, access control points in perimeter fencing, storage areas and all utilities (water, power, etc.). Motion detection lights or devices will be used and will ensure any detected movement will activate lighting and/or CCTV. It will be placed to increase protection in vulnerable/hidden areas. Exterior lighting will meet the illumination requirements of any

CCTV or other video systems installed. Exterior lights will be tested and inspected periodically (weekly) to ensure proper function. Lights of sufficient intensity will be located at main gates and entrances that are controlled by security or responsible activity personnel, to include:

- Lights over all lockup doors.
- Lights for restricted areas and sensitive item storage.
- Lights along remote buildings and interior fence perimeters; and, in parking lots for crime prevention purposes.

The outside perimeter of the Cultivation Center will be sufficiently lit to facilitate surveillance by employees, guards or law enforcement. All lights will provide sufficient light to allow for facial recognition of any persons attempting entry into building. Exterior lights on buildings that are exposed to breakage will be provided with lens covers or screens. The Facility lights will be wired to ensure security 24 hours per day.

Doors

There will be a locked door between the facility's entrance and all limited access areas. The limited access areas shall only be accessible to registered qualifying employees, principal officers and agents, service professionals conducting business with the Applicant, and other persons authorized by the law. All doors will be secured with electric strike locks that remain locked in the event of power loss (default secured). Locks will be unlocked and opened through the use of a proximity badge or device (fob), with a keyed override system installed. Secondary locks will be located on each door in addition to the electronic locks. In addition, all ADA requirements will be incorporated regarding life safety/disability compliance. As much as possible, one door at the facility is to be designated as a lockup door. This door is the first opened and the last closed. The alarm keypad should be located at/near this door to allow for the delay feature to be utilized. All exterior doors will be made of steel or other metal construction. If interior doors are not metal, they should, as a minimum, be 1- 3/4 inch solid or laminated wood, and be secured by locking devices which have a 1-inch throw deadbolt.

Locks

Commercial-grade II or higher, non-residential locks will be utilized at all point of ingress/egress, in all interior doors, as well as the surveillance room or area. The ability to remain operational during a power outage is required, and the Applicant will ensure all access doors are not solely controlled by an electronic access panel to guarantee that locks are not released during a power outage. Antifriction locksets or inter-locksets with deadbolts must conform to the ANSI A156.13 standard. Medeco brand keyways/locks will be used in all doors, interior and exterior. These locks contain UL 437 Listed physical strength components that greatly inhibit picking, drilling, bumping, prying or other forms of attack. They also come with utility patent protected keys that cannot be duplicated except by an authorized Medeco dealer/locksmith. All deadbolts will be at least 5/8 inches x 7/8 inches with a concealed hardened steel roller. Existing doors that are secured by key-in-knob locks must have deadbolt lock sets installed for added protection. Strike plates must use plate reinforcements that are secured with 3-inch screws. Cylinder rings must be provided with hardened steel inserts. No brass shackled

or brass bodied locks should be used for exterior applications on gates, doors, or in conjunction with hasps. Only case hardened padlocks and devices should be used to secure all property (except in those areas where non-spark brass is required by safety regulations). Double doors, not otherwise securely locked, must have deadbolts or cane-bolts (1/2-inch diameter or larger) installed on interior sides of one or both doors, top and bottom, with a minimum throw (recess) of 1 inch. An astragal of metal should be firmly affixed to the exterior of any door(s) which has a gap between the door and frame (or other doors as in the case of double doors), through which the lock or latch may be attacked or manipulated. Astragals should run the length of the door, top to bottom or side to side; but, if impractical, for the sake of cost, not less than 24 inches when used in vertical applications. Panic hardware used on doors must be of the type that allows instant exit in case of emergency; however, where devices used are not lockable, they are applied only to solid doors that have no windows. If doors are locked or chained together after duty hours, special precautions must be taken each duty day to ensure exit doors are open and functioning properly. The preferred panic devices are those with vertical rods (extension bars) to the top and bottom of one or both doors. With any door, the locking devices may malfunction if not properly installed. Deteriorated doors and abuse during operation are another cause. Responsible personnel should be continually aware of the condition of doors and locks. All doors, not used for lockup purposes, should be secured on the interior side by an approved and secure method.

Securing Cash

The Applicant's will use non-cash methods of payment and invoicing when feasible. However, when cash handling is required the following precautions will be enforced

- Adequate storage sites and containers with limited access to fund storage areas and key control.
- Adequate guards and procedures for the transportation/securing of the funds.
- Intrusion Detection Systems (IDS) for fund storage sites and duress alarms for cashiers with IDS signs posted on the entrance to the alarmed room.
- No slush fund with which overages or shortages are made up.
- Proper fund custodians appointed with separation of functions and or access.
- For any cash or similar funds that need to be stored, safes will be provided in secure rooms with lockable doors.

Guards

Guards and/or patrols will be used in conjunction with other security measures. The Applicant will use non-business hour guards or patrols to augment normal security levels, and utilize them during times of increased threat (scheduled protests, during hours of darkness, during non-business hours, etc.). Guards will be permanently stationed on site during business hours, and, at a minimum, will visit the facility as part of regular mobile patrolling arrangements during non-business hours. The guard patrols, at a minimum, will check all exterior doors and windows to ensure they are secured, and ensure no unauthorized vehicles or personnel are on facility property. All guards will have periodic and current criminal background checks to ensure continued qualification for the job. They will also be periodically covertly audited/observed by a supervisor to ensure compliance with all requirements. The guards will be properly trained and proficient in

industry/law enforcement recognized use of force continuum (non-lethal to lethal), and will be tested and trained to ensure continued knowledge/ability. They will also be properly trained and proficient in industry/law enforcement recognized active shooter protocols. The guards will also be responsible to ensure no unauthorized personnel remain on the premises after their authorized business is conducted, as well as ensuring the maximum capacity for the facility is never exceeded.

2. SECURITY SURVEILLANCE SYSTEMS

Overview

The applicant will use a professionally monitored security and surveillance system that is operational 24 hours a day 7 days a week. All recordings will be made available to the City upon request and copies will be kept for a minimum of 30 days. All recordings will be capable of being exported in standard MPEG formats to mediums such a DVD or USB drive upon the City's request.

Alarm System

All security equipment will be inspected and tested at regular intervals, not to exceed 30 calendar days from the previous inspection and test to ensure the systems remain functional. The security system will not only provide protection against physical entry, but also against theft and diversion that is facilitated or hidden by tampering with computers or electronic records. The system will be closed circuit and installed by an Alarm Installation Company licensed in the State of California, providing 24/7 monitoring.

Duress Alarm

Each employee will be given a duress code to use in case they are forced to disarm the alarm under duress.

Panic Alarm

Multiple audible Panic Alarms will be located throughout the facility. One in main office area, one in each Grow Room, one in Video Room, one in lobby, and one in loading dock area. Panic Alarms will send a signal to the alarm monitoring company.

Hold-up Alarm

Silent hold-up alarms will be located in the same general areas as the audible Panic Alarm, but not too close to cause confusion as to which alarm is being used. Panic Alarms will send a signal to the alarm monitoring company. Each employee will be trained in the proper use of each of these alarms upon hiring, and will understand the serious nature of any false alarms that may occur due to their actions. A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system will be utilized.

Alarm Maintenance

The Applicant will have the security alarm system monitored and inspected on a routine basis by a professional Alarm Installation Company.

3. ELECTRONIC SECURITY SURVEILLANCE SYSTEM

Surveillance System Description

The Applicant will install a PTZPros.com video surveillance and camera recording system at the proposed Cultivation site that is fully digital and meets the specifications and requirements of California and the City of Colusa . All surveillance systems and camera coverage areas will be physically inspected for compliance and receive approval from the applicable licensing board prior to being utilized. It will be required that all personnel installing, cleaning, maintaining and repairing surveillance equipment on site will possess applicable licensure and certification credentials. The time to be measured by the systems will be in accordance with the official United States time established by the National Institute of Standards and Technology and the U.S. Naval Observatory at: <http://www.time.gov/timezone.cgi?Central/d/-7/java>.

The Applicant will ensure that all surveillance equipment is properly functioning at all times and that the playback quality meets City and State requirements. The Applicant will have all documentation, approvals, and variances, or copies thereof, relating to surveillance, kept in a locked room (video/server room) with restricted access, and all documentation, approvals, and variances, or copies thereof shall be available to the City upon request. No Cultivation center operations will occur in any of the site's areas that could damage the security system.

The Applicant's security system will provide unobstructed video surveillance of all enclosed Cultivation areas, unless prohibited by law, including all points of entry and exit that will be appropriate for the normal lighting conditions of the area under surveillance. The cameras will be directed so all areas are captured, including, but not limited to, safes, vaults, production areas and areas where cannabis products are stored, handled, dispensed or destroyed. Cameras will be angled to allow for facial recognition, the capture of clear and certain identification of any person entering or exiting the facility and in lighting sufficient during all times of night or day. Unobstructed video surveillance of all areas, unless prohibited by law will be captures

All video surveillance equipment will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. A photo printer capable of immediately producing a clear still photo from any video camera image will be located on the premises. All recordings will be erased or destroyed prior to disposal. All equipment will have auxiliary power to maintain security and surveillance systems for at least forty-eight (48) hours following a power outage.

A Server Room will be established in a secure area that will not be accessible by unauthorized personnel. This will be the area in which video recording equipment will be installed, operated and monitored. The system's digital video recorders (DVR) will be

housed in a secure locked cabinet in this area. Access to rooms where surveillance recording equipment resides will be limited to persons that are essential to surveillance operations, law enforcement authorities acting within their jurisdiction, security system service personnel, and City or State officials. A current list of authorized Cultivation agents and service personnel that have access will be available upon request. A current list of authorized employees and service personnel that have access to the surveillance room will be posted in the server room. The server room will remain locked. At least one surveillance camera will be in the server room or view access to the server area and record and be able to clearly identify any person who accesses any surveillance or non-surveillance equipment.

Surveillance Equipment

Fixed position or remote video cameras will be network accessible using approved DVR/NVR software or will be internet protocol (IP) in design and will meet or exceed the following minimum specifications:

- All new and replacement cameras for critical areas and the fixed and pan-tilt-zoom camera (PTZ) cameras within those areas will meet minimum requirements as set forth in the standards provided by the City.
- At least one 19" or greater call up monitor attached to the DVR/NVR or a playback station with a 19" monitor or greater will be accessible to DVR/NVR controls for playback operation.
- All other monitors will have a minimum resolution of 1280 x 1024.
- All cameras will be viewable in multiplex mode from a 19" or greater monitor when used in critical areas and be able to pull a single camera (live and on playback).
- The contracted security firm will have a failure notification system that provides an audible and/or text and visual notification of any failure in the surveillance system. The Failure Notification system must provide an alert to the licensee within five (5) minutes of the failure, either by phone, email, or SMS (text) alert contact.
- The proposed Cultivation center will be able to immediately produce a clear color still photo from any camera image (live or recorded). The center will have a minimum of one (1) color printer that produces a minimum of 9600 dpi.
- PTZ cameras will be 360 degree functional in customer areas and will be enclosed in a shaded housing, so that it is hidden from view. PTZ cameras that are mounted adjacent to walls will have a minimum of 270 degrees of functionality.
- All recordings will be capable of being exported in standard MPEG format to another common medium (such as a DVD or USB drive).

A date/time will be embedded on all recordings of Cultivation center areas. The date and time will be synchronized and set correctly and will not significantly obscure the picture. All recordings will be erased or destroyed prior to disposal or when discarded by any other means, except that the recordings must be retained for the period of time set forth by the City and State. Notwithstanding this rule, recordings will not be destroyed if the

applicant is aware of a pending criminal, civil or administrative investigation or legal proceedings for which the recording may contain relevant information.

All limited access areas, security rooms/areas and all points of ingress/egress to limited access areas and all points of ingress/egress to the exterior of the premises will have fixed camera coverage capable of identifying any activity occurring within a minimum of twenty (20) feet of all entry and exit points. All camera placements will allow for the clear and certain identification of any individual in and/or on the licensed premises.

All entrances and exits to the facility will be recorded from both indoor and outdoor vantage points, and capable of clearly identifying the individual entering or exiting the facility. The system will be capable of clearly identifying any activities occurring within the facility. Areas where cannabis products are stored will have a camera placement in the room facing the primary entry door, and in adequate fixed positions, at a height which will provide a clear unobstructed view of the regular activity without a sight blockage from fixtures or other equipment, allowing for the clear and certain identification of persons and activities therein at all times. Cameras will be placed at each location where weighing for waste disposal, or tagging activities, if any, occur. These cameras will allow for the clear and certain identification of all individuals and activities therein at all times. All limited access or critical areas will have sufficient fixed cameras allowing for the clear and certain identification of any transacting individual(s) in that area

Surveillance Recordings Protocols

The Applicant shall retain at the Cultivation center for at least four years, records of all inspections, servicing, alternations and upgrades performed on the systems and shall make the records available to the City and its authorized agents within 2 business days following a request. If a mechanical malfunction causes more than an 8-hour period with inoperable surveillance equipment, The Applicant shall notify the City immediately and provide alternative measures that may include closing the facility.

All electronic video monitoring will be available on a real time 24-hour a day, every day, live feed accessible to the City. A printer will be available on-site to provide the ability to immediately produce a clear, color still photo from the surveillance video, either live or recorded as required. The Applicant shall provide up to four (4) screen captures of an unaltered copy of a video surveillance recording to the City if required. All records will be available for at least 30 days upon request to the City. Security videos must be capable of being exported in standard MPEG formats to other common mediums, such as DVDs and USB drives.

Sample Service Equipment

The Applicant will contract for the installation of two completely independent state of the art security systems that will enhance security, provide audit trails, electronically enforce facility access and prevent any losses through the use of burglary protection, generate emergency police calls. These systems will have electronic access control and CCTV surveillance, recording, and retrieval systems that will be a source of a real-time video feed to the City and appropriate Law

enforcement agencies. The general specifications and characteristics of these systems are summarized below.

TYCO Integrated Security System (example)

- Honeywell VISTA-128FBP control panel;
- American Dynamics CCTV system;
- Passive Infrared Intrusion sensors;
- Duress Alarms;
- Motion Detectors; and
- High security alarm contacts on doors.

Primary Design

- Two UL-listed premises burglary protection systems with a continuously-polled IP off-premises connection and with a backup cellular transmitter;
- The ability to remain in operation during a power outage (battery back-up for security only);
- Monitoring and logging of openings/closings of all facility areas
- The use of a web-hosted access control system throughout the premises (enabling management to control access to the facility by all access credentials);
- Daytime annunciation of all perimeter entrance doors, roll-up doors, fire exit doors, and roof hatch;
- Manned video surveillance of facility during regular business hours

Video Camera Housing and Mounts

All housings will be sufficiently moisture resistant to withstand any environmental conditions expected at A Cultivation Center. All cameras located in areas where conditions are subject to extreme temperatures will be in housings equipped with heaters and/or blowers as required. All housings will allow sufficient room for servicing and adjustment to each camera. All mounts holding devices exceeding 5 pounds in weight will be equipped with a safety cable attached to nearby structure. Outdoor camera housings will be rated International Protection Rating of 67 or above.

Power Backup

All cameras, recording equipment and associated network switching will have sufficient backup and auxiliary power to maintain operation for at least 48 hours following a power outage.

3. PRODUCT SECURITY

Using State Approved Tracking System

Theft, diversion and product security starts with having an appropriate product tracking system. The State compliant tracking software (“METRC”) will allow for a complete PIN and/or biometric employee chain of custody tracking for the entire Cultivation center starting with seedlings. In addition the following methods outlined below will tightly control access to cannabis, preventing diversion.

Containment Management and Operations

All cannabis in the process of production, distribution, transfer or analysis will be stored in locked containers when not being immediately used to prevent diversion, theft or loss. The cannabis will be accessible only to the minimum number of specifically authorized personnel essential for efficient operation, and shall be returned to its secure location immediately after completion of the process or at the end of the scheduled business day. If a production process cannot be completed at the end of a working day, the processing area or tanks, vessels, bins or bulk containers containing cannabis will be securely locked inside the vault and/or safes at the end of the day.

Identification, Admittance & Interior Movement Control

No person, except Cultivation Center personnel, local law enforcement, the City or the City's authorized representative, inspectors, or other federal, State or local government officials when necessary to perform their governmental duties, will be allowed on the premises of Cultivation Center, except that:

- Emergency personnel may enter a Cultivation Center when necessary to perform their duties;
- A Cultivation Center may allow contractors to enter a Cultivation Center when they are working on a job unrelated to cannabis, such as installing or maintaining security devices or performing electrical wiring; and

Controlled Area. At a minimum, the entire facility is designated as a Controlled Area. No one will be admitted into a Controlled Area without a demonstrated need. In addition, once an authorized person's business is conducted or terminated, they will not be allowed to remain in the Controlled Area and will be escorted from the area.

Restricted Area

Any area that contains cannabis, money, company proprietary information or items, etc., is designated a Restricted Area. All restricted access areas will be secure at all times with locking devices in all doors that prevent access from the Controlled/Limited Access Areas. Only authorized agents will be allowed in Restricted Areas. Authorized Agents consists of: Cultivation Center employees, local law enforcement conducting official business, the City authorized representative, inspectors, or other federal, State or local government officials when necessary to perform their governmental duties. All restricted access areas will be identified by the posting of a sign that shall be a minimum of 12" x 12" and that states "Do Not Enter – Restricted Access Area – Access Restricted to Authorized Personnel Only" in lettering no smaller than one inch in height.

Limiting Employee Theft

All packages or handheld items are subject to search before entry or exit from buildings or activities. US mail is excluded from search if properly marked, sealed, escorted, or otherwise identified in documentation. The Applicant is responsible for establishing package controls to minimize the loss of property, and to preclude internal theft. To limit internal theft, the Applicant will provide procedures for the control and restriction of employee-owned packages at the workplace (excluding lunch items). Employees will, upon entering and upon leaving the workplace, be prepared to show supervisors or

security personnel the contents of privately owned packages brought into the workplace. The Applicant will provide suitable and secure locations for personal lockers and package storage areas.

Employee Badges

The purpose of the ID program is to enhance the security and safety of all stakeholders and employees at the Cultivation Center. Each employee, contractor or visitor is responsible for the integrity and safekeeping of his or her badge. The individual shall not alter, obscure, damage, or deface the badge, including the photographic image of the licensee, and any information contained or represented thereon, in any way. Any employee who forgets his/her badge should immediately advise The Applicant to obtain a replacement Employee ID Badge. Employees must wear their badges at all times and non-compliance can result in termination.

Contractor Badges

A Contractor is a vendor, supplier, professional service representative or consultant ("Contractors") who has authorized business with the company. Contractors are required to sign in and receive an identification badge if they will be accessing Secured Areas of the facility. Contractors who will be on company owned spaces for only one day or less will be provided a Visitor Badge. Security guards will be trained to issue Visitor Badges to Contractors entering the facility. Contractors should be instructed to wear their badges properly while in Secured Areas of the facility.

Separation of Employment, Completion/Termination of Contractor Services

Upon separation of employment or completion/termination of Contractor services, company ID badges must be returned to the Applicant

Wastewater Management Plan

1. *Please describe efforts you are exercising/planning to exercise to reduce or eliminate, or otherwise control any pesticides, fertilizers, or other substances used within your cultivation process, as it relates to potential accidental discharge into the wastewater system.* ^[L]_[SEP]
- During cultivation all plants will be placed on solid trays that have a recirculating, automated, watering system to prevent any run-off. See Picture below



- In flowering rooms plants will be fed through an automated, watering system, where all nutrients are contained preventing run-off and saving water.
- All fertilizers and pesticides will be stored indoors in climate controlled areas

- Absorbent and approved materials will be kept onsite to manage potential spills. The majority of our pesticides are 25B products. Including Green Cleaner, Cease and Azamax.
- Drain covers will be used on all drains in cultivation rooms to prevent accidental discharge of chemicals into municipal water supply.
- As part of The Applicant's Employee Manual all staff will be required to understand that the following are not be disposed of in the public sewer system
 - Storm water
 - Wastewater have a pH in excess of 9.5
 - Fats, oils and grease that might cause any visible sheen on the surface of discharged wastewater or a build-up of fats, oils and grease
 - Hauled waste
 - Any substance that can cause excess foaming
 - Any solid substance or particles in a quantity, either by itself or in combination with other wastes, that is capable of obstructing flow or impairing the performance of the public sewer system;
 - Cement like materials
 - Flammable liquids, solids or gases capable of causing or contributing to an explosion in the public sewer system (such as kerosene, paint thinner, turpentine, benzene, ethers, alcohols, etc.).
 - Any substance that may cause damage to the any part of the public sewer system.
 - Food wastes that cannot pass through a ¼ inch sieve
 - Hazardous, infectious or radioactive wastes
 - Poisonous Substances
 - Any wastewater containing acid iron picking wastes or concentrated plating solutions.
 - Any substance that may now or in the future be prohibited by the Colusa regional county sanitation district sewer use ordinance.

2. *How are pesticides, fertilizers or other substances stored, and what mechanisms (i.e., secondary containment systems) are in place to prevent an accidental discharge into the wastewater system?*

- The Applicant will implement a best in class Integrated Pest Management system focusing on controlling insects, pests and infestations. As part of this IPM containment and storage will be a focal point for all employees.
- Pesticides and fertilizers will be stored indoors in climate controlled environments and handled only by those qualified to do so.
- Fertilizers will be stored in a secure area and placed in specific containment area of the facility.
- The Facility will be designed with concrete sealed and impenetrable floors
- All pesticides utilized will be stored on site in limited quantities of less than 1 gallons of liquid per type of wet pesticide/fertilizer and less than 2 pounds per

type of dry pesticide/fertilizer. No more than 50 pounds of liquid pesticide/fertilizer and 5000 pounds of dry pesticide/fertilizer will be kept at any one time at the facility.

[1]
[SEP]

3. *Please describe what mechanical provisions you have in place to prevent any potential overflow of water and/or wastewater.* [1]
[SEP]

- 2 Cultivation employees fill the Applicant's reservoir system manually at the start of each cycle. Employees are trained on this detailed process resulting in no overflow of water.
- Float valve shutoffs are used and installed in all water and wastewater storage tanks.
- Fertilizers will be stored in a sufficiently sized and separated containment area
- Water sensor alarms will be placed near water storage tanks and near all electrical rooms.
- Reservoirs are constantly recalculated to prevent run-off

4. Please describe with detail the "recycling" process of your irrigation system, and the anticipated percentage of unusable water as compared to water used in operations (example: "Our irrigation process will utilize approximately 90% of the water coming into our facility for irrigation purposes with approximately 10% ineligible for reuse. Our irrigation process is as follows...and results in approximately 10% of unusable water, which becomes discharged wastewater.").

The Applicant's irrigation process is a drain to waste system. We have grow link that allows us precision feeding so we have less than a 10 percent runoff.

The Applicant's irrigation process is as follows

- In a vegetative state plants are placed in a Rockwool medium, fed through 8'x4' trays where the nutrient is fed through a drain to waste system. Vegetative Systems double stacked with LED lighting..
- During flowering, plants are placed in two rockwool stabs in a drain to waste fashion.

4. Please indicate whether a water meter and backflow device have been installed at the site. If installed, please provide proof that these two items are existing on the site. [1]
[SEP]

Currently the site does not have a water meter or backflow device. The Applicant's extensive plans call for installation of appropriate water meter and backflow devices required by the City of Colusa .

ODOR MITIGATION

Overview

The Applicant is committed to being a good neighbor and mitigate odors and smells that may come from the Facility. All options for reducing and eliminating this nuisance will be examined and implemented on a pro-active as need basis.

Air Control Systems Overview

Air Control Systems are used to foster humidity in a closed grow environment, a necessary component for higher yielding cannabis plants. Key systems that will help with this process include inline fans, air curtains, elongated-horizontal fans and stationary fans. Carbon scrubbers (natural particulate filters) will be installed in each area for odor elimination.

Temperature

Temperature will be maintained by thermostat controlled, rooftop HVAC units, which will help to mitigate increasing odors at higher temperatures. The Applicant will also incorporate VisQueen (a surable polyethylene sheeting), when appropriate, in the drywell to aid as a temperature and odor shield.

Carbon Filters

Carbon filters, also known as carbon scrubbers, are standard odor-control devices that adsorb impurities and aromas from the air through a chemical process, trapping them inside the pore structure of the carbon substrate and ensuring the smells do not escape into the surrounding area. The Applicant will install carbon scrubbers throughout the Facility. Fans will be attached to the carbon filters pushing air through the scrubbers.

Odor Neutralizers

Unlike carbon filters, which extract odors from the air, odor neutralizers cover up the smell. The Applicant will install Odor neutralizers in exit areas of the Facility

Air Purifiers

Air purifiers will be used to reduce odors through a filtering process. These purifiers, when used in conjunction with the other methods described here, can help to boost odor mitigation throughout the Facility.

Ozone Generators

Ozone generates clean air by killing mold, mildew and bacteria by cycling air through special processors. They are highly effective at removing odors in concentrated areas and have the added benefit of creating negative pressure environments hostile to pests and insects.