

## NEIGHBORHOOD COMPATIBILITY PLAN

Based on our experience operating compliant retail and delivery operations in 16 other communities, we understand the importance of proactivity in resolving potential issues before they arise, and that accessibility is vital to preventing concerns from escalating into issues. Embarc has a proven approach to neighborhood engagement and responsiveness, as well as a detailed plan to prevent and/or appropriately address community concerns before they rise to the attention of the City.

We will proactively work with community members, neighborhood leaders, and local businesses to build a synergistic relationship based on respectful dialogue and ongoing approachability and will establish meaningful partnerships that will ensure our reimagining of the proposed location serves as a net benefit to the neighborhood's health, safety, aesthetics, and economic viability, both for our proposed business and neighboring uses.

### WHY SUTTER CREEK

Sutter Creek is exactly the kind of community our team is passionate about serving: a place with a strong sense of identity, a historic small-town character, and a deep connection between local businesses and the people who call the area home. For our team member who was raised in Sutter Creek, this project is especially personal. We are not approaching this as an outside operator simply looking to place another retail location on a map. We see an opportunity to thoughtfully integrate into the fabric of the community, create a welcoming and professionally operated storefront, and contribute positively to the long-term vitality of the area. From the design of the space to our approach to community engagement, our goal is to reflect and honor the character that makes Sutter Creek unique.

We also believe the proposed location at the intersection of Highway 49 and Ridge Road presents a

uniquely strong opportunity from both an economic and practical standpoint. Positioned along two of the region's primary travel corridors, we believe this site will be able to capture existing traffic flow while serving a broad geographic area that extends beyond Sutter Creek itself, including residents and visitors traveling throughout Amador County and the surrounding foothill communities. Rather than pulling activity away from the community, we believe the project can help generate additional economic activity in the area by drawing consumers already traveling through the corridor and encouraging them to stop, shop, and engage with neighboring businesses. The combination of strategic location, local passion for the community, and a thoughtful operational approach is what makes us excited about the opportunity to invest in Sutter Creek for the long term.

### PREVENTING NUISANCE IMPACTS

Embarc's best practices are rooted in proactive steps to ensure our cannabis operations do not become a nuisance or negatively impact our neighbors or the surrounding community. Embarc will proactively engage with our surrounding neighborhood to respond to potential complaints regarding issues such as noise, light, odor, public consumption, loitering, littering, and vehicle and pedestrian traffic.

Embarc's best practices and Standard Operating Procedures (SOPs) ensure our business is a positive addition to the community and can be boiled down to three critical components—ensuring accountability and accessibility; proactively engaging the community and neighborhood; and creating tangible benefits for our neighbors.

#### **Step 1: Accessibility & Accountability**

The first step to avoiding becoming a nuisance or having negative impacts is accessibility and accountability with our neighbors and the City we serve. Embarc will provide the City and all neighboring businesses and residents within 1,000 feet with contact information for our Community

Liaison, to whom notice of any problems can be provided 24/7. The to-be-hired General Manager and our Government Relations Manager will be the Community Liaisons for outreach and communication with the community. Contact information will be posted on the facility's exterior and online. Embarc's owners and managers will attend meetings with the Sutter Creek City Manager or their designee to discuss retail cannabis implementation-related issues.

This will ensure accessibility at all levels for the neighborhood and the surrounding community. The Community Liaisons will be responsible for receiving, logging, and responding to any and all complaints and inquiries.

Embarc will encourage neighbors to report any impact, real or perceived, that they experience in relation to Embarc's operations and will dedicate all reasonable time and effort to resolving any such issue to the satisfaction of the impacted neighbor. This mitigation could include making a roaming Security Officer available to address nuisance activities perceived as attributable to Embarc's business operations. Any such assigned Security Officer will be directed to mitigate the situation to the maximum limit permitted by the Private Security Services Act. Embarc will encourage neighboring residents to contact our personnel prior to contacting the City.

To ensure accountability, Embarc will maintain a log of any public nuisance activity on the premises or within 300 feet of the premises. The log will include information, including but not limited to the date and time of the occurrence, the type of activity, the circumstances surrounding the activity, the identity of any persons involved in the activity, the corrective action taken by Embarc, and the Police Department if applicable. The log will be available to the City upon request.

The inquiry will be managed by our General Manager or Government Relations Manager, depending on the nature of the issue and whether it is

community or operationally-based. Our Government Relations Manager and/or the General Manager will be responsible for resolving any issues or concerns brought to our attention in a timely manner.

As discussed above, Embarc's owners, managers, and Community Liaisons welcome the opportunity to attend regular meetings at the request of the City Manager, Chief of Police, or any other relevant authority to discuss any and all issues associated with legal cannabis operations in Sutter Creek.

Ultimately, our goal is to mitigate any concerns before they arise to City leadership, and we will utilize our proven policies and tactics to achieve this goal.

## **Step 2: Proactive Community & Neighborhood Outreach**

In our experience, proactive community and neighborhood engagement is a critical step in building trust and, in turn, positive relationships with our neighbors. We appreciate the importance of proactive engagement and ongoing collaboration with the community at large and the neighborhood surrounding our facility. As such, in addition to the extensive community benefits programs detailed in our Community Benefits Plan, we have also identified proactive and ongoing engagement strategies to ensure thoughtful integration of our proposed operations into the neighborhood:

**NEIGHBORING BUSINESS OUTREACH:** Embarc will meet with neighboring businesses to detail proposed operations and identify opportunities for potential partnerships (where appropriate given the use type). As part of this outreach plan, Embarc will provide the names, telephone numbers, and email addresses of the Community Liaisons to whom notice of problems associated with the cannabis business can be provided.

Additionally, once the General Manager has been hired, Embarc will schedule another meeting to facilitate an introduction and the exchange of

contact information between the General Manager and neighboring businesses. We have found that establishing this relationship is the single most important mechanism for managing neighbor relations, as neighbors who feel comfortable contacting us directly with issues or concerns ensure we can address them in real time.

**OPEN HOUSES:** In addition to the Community Listening Session we had, and the one we intend to host in coming weeks, we will host an open house between receipt of the right to operate locally and the commencement of operations, designed to provide residents and other stakeholders with the opportunity to meet our team, ask questions about our operations, and get a better understanding of Embarc’s vision. During these discussions, we will focus on impact mitigation and community benefits, and we will be available to answer community questions and/or concerns. Having these direct engagement opportunities is important for addressing operational concerns.

Based on our experience, this type of community outreach is essential to dispelling myths and creating awareness of how legal cannabis dispensaries operate.

**INFORMATIONAL CANVASSING:** Embarc will canvass relevant community and neighborhood stakeholders and continue to connect with residents and nearby businesses before opening, providing contact information and engaging directly to answer any questions about our operational plan. Doing so helps proactively address comments and concerns before opening the business.

**ONGOING ENGAGEMENT:** Once operational, our ownership and management team can occasionally host “listening sessions” where community members can voice opinions, ask questions, and meet the Embarc team. Our goal for these sessions is to address any unforeseen concerns and ensure we fulfill our obligations as a good neighbor.

### **Step 3: Creating Benefits for Our Neighbors**

The third step in ensuring nuisance avoidance is to create and deliver tangible benefits through our operations to our neighbors and the surrounding community.

**NEIGHBORHOOD SAFETY:** Increased safety around the facility is a positive byproduct of the extensive attention to detail in our facility’s security measures. Our presence in the neighborhood includes patrolling Security Officers, an industry-leading surveillance system with coverage across the entire interior and exterior of the facility and beyond, and advanced alarm systems with immediate access to local law enforcement. We are confident that the extreme importance we place on facility security and safety will have a positive impact on the safety and well-being of our neighbors. In fact, other communities near legal cannabis facilities have seen increased property values due to enhanced security and beautification efforts.

**NEIGHBORHOOD BEAUTIFICATION:** While engaging the neighborhood is critical, we also believe in the importance of rolling up our sleeves and participating in ongoing beautification efforts. As part of our paid employee volunteerism program, detailed further in our Community Benefits Plan, our staff will serve as a volunteer Street Team on beautification projects near the store, informed by ongoing discussions with our Community Advisory Board and neighboring businesses regarding neighborhood priorities.

**COMMUNITY ADVISORY BOARD FEEDBACK LOOP:** Embarc’s Community Advisory Board will be comprised of local community members who will help shape best practices to innovate, improve operations, and mitigate potential complaints from citizens, customers, other businesses, and the community at large. They will be empowered to provide ongoing feedback, guidance, and accountability for our nuisance mitigation and proactive community engagement programs. This gives

residents a seat at the table in addressing business operations in real time.

### **PARTNERSHIP WITH THE SUTTER CREEK POLICE**

**DEPARTMENT:** In every city where we operate, Embarc has established strong, collaborative relationships with local law enforcement, fostering trust and transparency in the emerging cannabis industry. We have reserved a non-voting seat on the Community Advisory Board for a City and/or Police Department representative, who will by virtue of their participation be provided with quarterly insights into our business operations. This approach has proven effective in maintaining open communication across various communities.

**COMMUNITY WELLNESS EVENTS:** Embarc seeks to support Sutter Creek's health and wellness industries. Through providing educational seminars and partnering on outreach, we are confident our team's knowledge and resources can benefit Sutter Creek's health and wellness industry. As further detailed in our Community Benefits Plan, Embarc is committed to hosting educational events on cannabis and welcomes the opportunity to include relevant wellness partners and businesses, when appropriate, in these efforts.

It is through this collaborative and proactive approach to business management, neighborhood engagement, and support for local businesses that Embarc will ensure we do not pose a nuisance to our neighbors and remain accessible, approachable, and transparent with the Sutter Creek community at large.

### **Proposed Good Neighbor Policy**

In every community where we operate, Embarc institutes a Good Neighbor Policy tailored to address local concerns and comply with local regulations. We have drafted proposed policies informed by our prior community outreach, including our first Community Listening Session, but would also welcome the opportunity to discuss our Good Neighbor Policies with City leaders to incorporate any guidance prior to finalization.

As a responsible cannabis operator, Embarc must:

- Create a safe exterior environment through design and site management.
  - Provide outside lighting in a manner that illuminates the outside street and sidewalk areas and adjoining parking as appropriate, without bothering neighbors;
  - Maintain the premises and adjacent sidewalk in good condition at all times;
  - Manage parking and traffic to negate impacts to surrounding areas;
  - Prohibit double parking directly outside the premises and prohibit blocking driveways;
  - Prohibit loitering around the premises, within 50 feet of the premises, or in the parking lot;
  - Enforce appropriate customer behavior outside the facility and in adjacent areas;
  - Prohibit littering in or around the premises;
  - Prohibit the consumption of cannabis products in or around the premises and advise individuals that consuming cannabis of any kind is prohibited in public places;
  - Post notices at all public entrances to and exits from the establishment that are clear, well-lit, prominently displayed, and maintained; and
  - Direct patrons to leave the establishment and neighborhood peacefully and in an orderly fashion.
- Provide the contact information for Embarc's Community Liaisons, responsible for community relations and issue mitigation.
- Provide adequate and appropriate ventilation to ensure odor controls result in no emission of noxious odors.
  - Be a benefit to surrounding parcels;
  - Maintain the premises in a clean and orderly fashion; and
  - Instruct security to secure the premises within 50 feet of all public entrances and exits.
- Follow signage requirements to ensure compliance with local codes and provide clear information for customers and the public:

- Business identification signage will comply with the requirements of the Sutter Creek municipal code
- No signs will obstruct any entrance, exit, or window of the building;
- Each entrance will have a sign clearly stating that smoking, ingesting, vaping, or consuming cannabis on the premises or adjacent areas is prohibited. The sign will not be larger than two feet by two feet;
- No advertising through sign holders or individuals on the premises or in public spaces;
- No signage depicting any images of cannabis or cannabis products
- At the entrance, a notice will clearly state that no person under 21 years of age, except individuals 18 years of age or older with a valid physician's recommendation for medical cannabis, is permitted to enter the premises;
- The original copy of the business license issued by the City, as well as the license issued by the California Department of Cannabis Control, will be posted inside the business in a location visible to the public.
- Implement youth education and prevention strategies.
  - Provide physical infrastructure, security, and tailored SOPs to discourage, mitigate and prohibit youth access and/or loitering; and
  - Provide ongoing investment for youth drug prevention and education to be deployed through community partners.

## Addressing Community Feedback

Embarc employs a protocol for addressing and responding to complaints related to its business, including potential complaints about noise, light, odor, public consumption, loitering, littering, and vehicle and pedestrian traffic, among others. This protocol is critical to ensuring consistent responses and providing the data we need to modify SOPs as needed to reduce the likelihood of issue recurrence.

Embarc will implement comprehensive good neighbor and nuisance mitigation strategies to alleviate community concerns. Although we believe our Government Relations Manager, General Manager, and the entire retail team will prevent these issues from arising by cultivating healthy communication with our neighbors, company policy will require that any staff member who receives a complaint report the concern to their manager immediately.

We understand other potential impacts may arise from normal business operations, which are not currently contemplated. Should that occur, we will work closely with community members, neighborhood leaders, and local businesses to document and resolve any issues. All necessary actions will be taken to resolve a complaint, and all records of complaints will be maintained. Should a complaint occur, employees will be required to adhere to the following written policies and procedures:

**STEP 1: DOCUMENT THE CONCERN OR COMPLAINT:** Any employee who receives a complaint will first document it on a standardized form. The employee will record:

- Store Name
- Name of Store Manager Submitting Feedback
- Community Member's Name (or "Anonymous")
- Phone Number (if provided)
- Email (if provided)
- Date of Feedback or Complaint
- Source of Feedback or Complaint
  - Feedback or Complaint Category
  - Noise
  - Light
  - Odor
  - Public Consumption (cannabis or otherwise)
  - Loitering
  - Litter
  - Vehicle Traffic
  - Parking
  - Pedestrian Traffic
  - Graffiti

- Youth Concerns
- Other
- Detailed Description of Feedback or Complaint
- Suspected Cause (if applicable)
- Corrective Action Taken (if any)
- Corrective Action Proposed by Store Management
- Measures to Prevent Recurrence
- Follow-Up Completed (Yes/No)
- Additional Feedback from Community Member (if any)
- Status

The employee will explain that they need the reporting community members' information for follow-up. Employees will be trained to ensure the complainant understands that we are sympathetic to the concerns and seek to address them immediately and transparently.

#### **STEP 2: IMMEDIATELY REPORT THE CONCERN OR COMPLAINT**

Employees will be trained and required to immediately report any concern or complaint to the General Manager, Government Relations Manager, Licensing & Compliance Team, and ownership team by submitting a response to our "Community Feedback Form." Employees are encouraged to provide their suggested solutions and potential mitigation strategies. Once submitted, the employee is also directed to speak with the General Manager in person or with a Store Manager if the General Manager is unavailable. If the issue is truly urgent, a member of our ownership team will be called immediately.

#### **STEP 3: DEVELOP & EXECUTE A PLAN OF ACTION**

Next, the General Manager and Government Relations Manager will develop and execute an action plan to resolve the issue. The plan will articulate, and Embarc will implement, a short-term solution to alleviate the complainant's concern as well as a long-term solution to prevent the issue from recurring. Long-term solutions will be incorporated into our SOPs to prevent recurrence, and employees

will be trained on the new policy within one week of implementation.

#### **STEP 4: FOLLOW UP WITH COMPLAINANT**

Our Government Relations Manager and/or General Manager will personally follow up with the complainant to ensure the concern is resolved in a timely and efficient manner. During the conversation, Embarc will identify actions taken to mitigate the concern and the protocols developed to prevent the issue from recurring. Finally, we will inquire whether the complainant has any additional concerns to be addressed or whether the issue was resolved satisfactorily.

#### **STEP 5: DOCUMENT THE INCIDENT & RESOLUTION**

Lastly, our Government Relations Manager will create a complaint report of the incident that documents the following:

- All information gathered in the original "Community Feedback Form"
- Action plan and resolution
- Protocols that were implemented to prevent the issue from recurring
- Follow up conversation with the complainant and their disposition of the resolution
- Training that occurred as a result of any newly developed SOPs.

Reports will be distributed to the ownership team and the Community Advisory Board to ensure accountability and awareness. Embarc will keep all complaint reports for a minimum of seven years, unless otherwise required by law. Periodically, our ownership team will audit these complaint reports to verify the effectiveness of the response and subsequent policy changes. This report log will be available to the City upon request.

To address and respond to complaints, Embarc will operate and maintain a 24-hour landline telephone number, or hotline, at the premises for receiving complaints and other inquiries regarding the cannabis business, as well as multiple 24/7 contacts. If any Embarc owner, manager, or

employee logs any conduct that raises a reasonable suspicion of a violation of local or State regulations, Embarc will report the conduct to the Chief of Police or their designee within 24 hours of its discovery.

## Ensuring Cannabis Products Do Not End Up in the Hands of Youth

In our experience, the most impactful way to address community concerns is to provide sustainable, dependable resources to educate youth both today and into the future. We and our future Community Advisory Board members will be committed to providing the tools and investment needed to protect and educate Sutter Creek's next generation.

During our community outreach thus far, we consistently heard from residents about the vital importance of safeguarding young people from the potential impacts of cannabis businesses as they begin to establish themselves within the City.

We wholeheartedly understand and support the emphasis both residents and the City place on protecting our youth. We believe we can make a significant, positive impact through the careful implementation of our comprehensive youth education and drug prevention programs, given we have a track record of doing so in nearly every community we serve today. We are dedicated to carrying out these initiatives throughout California, ensuring that we contribute meaningfully to the well-being of young people and the broader community.

After much research and eliciting community feedback, Embarc chose the Botvin curriculum as the most effective and engaging youth drug prevention program. Our process involved identifying a target age group, adopting Botvin's certified resources, using a cognitive-behavioral framework, and conducting workshops with stakeholders such as drug prevention specialists, law enforcement, City Council members, parents, and Unified School District members across California communities. Botvin's e-LST Middle School 1 is a scientifically

backed substance abuse and violence prevention program with over 35 years of research.

We first launched the Botvin program in 2022 through the Community Advisory Board at our first store in South Lake Tahoe. The Board used funds from our Community Investment Fund to implement the curriculum for the Boys and Girls Club of Lake Tahoe, engaging local youth in meaningful discussions. The Boys and Girls Club of Lake Tahoe piloted the program for 24 fifth-graders in 10 weekly 45-minute sessions and 28 teens, primarily sixth and seventh-graders, in 12 weekly 45- to 60-minute sessions. Participants appreciated learning about managing emotions, coping with stress, and applying the three Cs (Clarify, Consider, and Choose) for decision-making. They were surprised by nicotine's addictiveness, targeted advertising, and its harmful effects on the body, ultimately gaining valuable knowledge and life skills. This program is further detailed in Sour Community Benefits Plan.

*"This program arms our youth with vital knowledge, often filling gaps in discussions that may not occur at home. Its value is immense, driving transformative change! While it may seem at times like teens aren't paying attention, they indeed are. The proof is in the conversations they carry forward, discussions that continue long after the day's lesson. This program doesn't just inform—it resonates and triggers important dialogues among the youth themselves."*

### Amy Lindstrom

Boys & Girls Club of Lake Tahoe, Teen Room Lead

Building on this success, we have since been in various stages of funding similar programs across all the communities we operate in throughout California, ensuring consistent support for education and prevention initiatives statewide. **Through our Community Advisory Boards and Community Investment Funds, Embarc has donated hundreds of thousands of dollars to launch youth drug education and prevention programs.** Youth

organizations in the following municipalities have already implemented these programs: South Lake Tahoe, Fairfield, Madera, Martinez, Alameda, Chico, Ventura, Fresno, Fontana, Woodland, and San Bruno.

*“Thanks to Embarc’s contribution, we have successfully implemented the acclaimed Botvin Life-Skills Training program, which has been pivotal in educating our young members on the dangers of substance abuse while empowering them with crucial life skills. Additionally, the funding has allowed us to purchase the curriculum, support a dedicated staff position to administer the program, and provide essential training for our team. We deeply appreciate Embarc’s proactive approach and ongoing commitment to ensuring the success of this drug education and prevention program.”*

### **President of a Prominent Youth Servicing Organization in One of Our Communities**

We are dedicated to forging relationships with youth-centered organizations in Sutter Creek and Amador County. Our goal is to provide impactful youth drug prevention education that aligns with their missions and benefits the broader Sutter Creek community, ensuring local youth receive the resources and support they need to thrive.

*“Through the Boys and Girls Clubs of Contra Costa, the Botvin curriculum has become a cornerstone of our youth education efforts, shaping the minds of young students in ways that extend far beyond the classroom. Through interactive discussions and hands-on activities, students are learning how to confidently make decisions, resist peer pressure, and understand the long-term effects of substance use. The program encourages students to explore how societal influences like advertising can skew their perceptions, sparking insightful conversations that we don’t see in other programs. With students already engaged in the curriculum, the community impact is undeniable. Embarc has been an invaluable partner throughout this journey, not just with financial support but through their consistent engagement and responsiveness. Whether it’s providing resources or checking in to ensure the program is running smoothly, their involvement*

*goes far beyond a typical business partnership. Embarc is genuinely invested in the health and future of youth in our community, and that makes all the difference.”*

### **Jose Marquez,**

**Executive Director, Boys & Girls Club of Contra Costa**

In addition to youth drug prevention programming, it is essential for cannabis retailers to design their facilities and operations in a manner that effectively prevents cannabis from falling into the hands of young people. It is our responsibility to implement a robust Youth Prevention Plan to ensure the safety, security, and quality of life for the neighborhood, including for Sutter Creek’s most promising residents—its youth.

As a cannabis retailer founded by policy and compliance experts, Embarc was born after the legalization and implementation of Proposition 64. We worked with State government to develop the policies that led to adult use legalization and industry-wide regulation. As part of that process, our team members have engaged with communities across the State and are acutely aware of the need to protect youth. When selling a product that was illegal during our lifetimes, we believe it is incumbent upon us to implement a plan that protects our youth while educating our community—through action and continuous engagement—that legal, regulated cannabis can and should responsibly exist within a community.

While some studies and experiences from other regulated markets have found that youth cannabis use remains static or decreases in communities with access to legal, regulated cannabis, we believe that it is especially incumbent upon us as operators to proactively implement security and other deterrent measures to protect against youth exposure or access. We also believe in our responsibility to educate the community on the protocols and security measures we have in place to protect youth as a component of our ongoing commitment to supporting the successful implementation of

youth drug prevention and education with our Community Advisory Board and non-profit partners.

We have many parents on our team, including our founders, and intimately understand the real concern parents face regarding how to navigate access to substances of all kinds within a community. We believe in our duty and commitment to the City, community partners, and neighbors to proactively engage, identify, educate, and address our local community's concerns regarding the safety and security of our neighborhood and the children that live, learn, play, and grow within it.

Embarc has developed a holistic, multifaceted approach to ensuring cannabis products do not end up in the hands of underage youth and that our storefront is safe, secure, and only frequented by those of appropriate age. A variety of physical features, staff protocols, and functional design concepts will be implemented at Embarc Sutter Creek to ensure a secure, comfortable environment that poses no risk to Sutter Creek's youth and positively contributes to the neighboring community. We will take a multi-layered approach to diversion prevention, including several state-of-the-art physical controls; detailed record keeping software; adequate and aesthetically pleasing exterior lighting; education for staff and the public; categorical access control; and dozens of other applied measures to ensure our products are only in the hands of authorized adults.

As responsible, community-oriented operators, we have developed a comprehensive Youth Prevention Plan to proactively take steps to ensure cannabis products do not end up in the hands of underage youth, briefly summarized below.

#### **INFRASTRUCTURE & SECURITY**

- Implement physical infrastructure, security, and training protocols to ensure no youth enter or loiter outside or within 50 feet of the storefront;

- Post all required signage in easily identifiable locations to communicate age restrictions, identification requirements, and to prevent loitering;
- Premises constructed and designed to prevent access by any unauthorized individual through a variety of security measures, including alarms, surveillance systems, and target hardening measures;
- Comprehensive surveillance system to provide full video coverage of the entire interior and exterior of the premises; and
- Professional Security Officers enforcing age restrictions and preventing youth exposure or access.

#### **SOPS & EMPLOYEE TRAINING**

- Staff training and education on the hazards of youth cannabis use and how to identify and prevent potential youth access to the licensed premises; and
- Stringent inventory control procedures will be put in place via an inventory tracking system, tools and forms for accounting and verification, and tasks and processes that will ensure accountability at every stage through the retail product cycle.

#### **PRODUCT PACKAGING & LABELING:**

- Embarc will only accept products from licensed distributors that conform to all packaging and labeling standards in the CCR § 17402–17412, including:
  - All packaging will be child-resistant and tamper-evident;
  - All packaging will have the California Universal Symbol;
  - All packaging will have the GOVERNMENT WARNING statement in bold print;
  - Package cannot imitate any package used for products typically marketed to children;
  - Edible products must be in opaque packaging;
  - Labeling must identify the product as a cannabis product or state “cannabis infused;”

- If the package contains an amount of THC that exceeds the level allowed for adult use cannabis goods, it must state “FOR MEDICAL USE ONLY”
- Employees utilize a check list at the time of product intake to ensure all proper packaging and labeling;
- All products sold to customers will be placed in an opaque child-proof exit bag before they are allowed to be carried out of the store; and
- At check out, Embarc reminds customers to safely store all cannabis products in their child-proof packaging and out of reach of children in their homes.

### AESTHETICS

- Exterior design of the premises has been developed to be a neutral presence on the street, without bright colors, imagery, or any design feature that would appeal to youth;
- No cannabis goods are visible from the exterior; and
- Site has been designed to be discreet and cohesive with neighboring uses.

### OVERSIGHT & ENGAGEMENT

- Marketing and social media will meet audience composition data requirements and be respectfully tailored to address our only audience—adults;
- Participate in Amador Chamber of Commerce meetings to monitor local trends and identify opportunities of need to raise to the Board for consideration;
- Engage nearby school leadership to provide contact information for our Community Liaisons and to seek to provide youth drug prevention educational resources as we have in other communities; and
- Engage in regular check ins with City staff and/or Council to provide updates on our operations, receive feedback, and incorporate recommendations.

### ACCESSIBLE, COLLABORATIVE, & TRANSPARENT

- Provide all neighbors within 1,000 feet of our proposed location with the contact information for our Community Liaisons and 24-hour community hotline;
- Facilitate transparent and accessible communications and relationships with our neighbors and surrounding community stakeholders; and
- Pursue a coordinated approach with neighboring and nearby businesses to collaboratively protect and support the youth in our community.

### EDUCATE, EDUCATE, EDUCATE

- Educate customers on the safe storage of cannabis in their home;
- Educate parents and community leaders by providing them with the resources to have difficult conversations with their kids about cannabis and the damages underage use can have on adolescent brain development as well as the increased potential of addiction in adolescent use;
- Partner with trusted community leaders to provide educational programming and resources to educators, community members, and non-profit stakeholders; and
- Fund a comprehensive, holistic approach to youth drug prevention and education programs (just as we do in every community where we operate).

## MANAGING EXTERIOR AREAS

Embarc recognizes that the areas immediately surrounding the business—including sidewalks, parking areas, and building frontage—are where community impacts are most directly experienced. As such, we place a strong emphasis on the active, ongoing management of all exterior areas to ensure they remain clean, safe, and well-organized at all times.

Our approach includes continuous monitoring by on-site staff and Security Officers, routine inspections of the premises and adjacent areas, and the

implementation of clear behavioral expectations for customers upon entering and exiting the site. Exterior areas will be maintained through regular cleaning, strategically placed waste receptacles, appropriate lighting, and clearly marked pathways to guide customer flow and prevent congestion.

Security Officers will conduct periodic patrols of the property and the surrounding vicinity to proactively identify and address potential concerns such as loitering, littering, or unauthorized activity. Additionally, Embarc will maintain clear, accessible communication channels with neighboring businesses and residents to ensure that any concerns related to exterior conditions are addressed promptly and effectively.

These practices ensure that exterior areas are not only well-maintained, but also contribute positively to the overall safety, cleanliness, and functionality of the surrounding neighborhood.

The following sections further describe how Embarc will actively manage exterior conditions to maintain a safe, orderly, and compatible environment.

### **Light**

Embarc understands the community's desire for a safe, secure facility that blends seamlessly into the surrounding neighborhood and allows for enjoying the night sky without obtrusive bright lights. In compliance with all regulations, the exterior of our facility, including the parking lot, will be adequately illuminated for security purposes while not posing a nuisance.

Exterior lighting will be balanced and will not result in glare on adjoining properties. It will complement the security systems, ensure that all areas of the premises and parking areas are visible, and provide increased lighting at all entrances to the premises. The exterior lighting required will be turned on from dusk to dawn.

Should facility lighting give rise to a complaint, we will work to develop a compliant lighting solution that accommodates neighborhood concerns without sacrificing security. Our security, maintenance, and operational teams will ensure that the electrical system and lighting comply with all applicable State and local laws, regulations, ordinances, and other requirements, are maintained in good repair, and do not present an electrical shock or fire hazard.

### **Odor**

California law requires that all products arrive at a retail establishment fully processed, tested, packaged, and sealed in child-resistant packaging. Because all products arrive at Embarc retail facilities in their final packaged form, there are virtually no odors associated with this license type. Specifically, per State law, all packaging will protect the product from contamination; be tamper-evident and sealed so the contents cannot be opened without destruction of the seal; and be child-resistant as stipulated by the California Department of Public Health Code (40415).

Our proposed dispensary will receive, store, and sell packaged products in their final form. Consequently, it is highly improbable that any on-site product will emit a strong odor. Nevertheless, Embarc is committed to mitigating odors associated with our facility and will be responsive to the odor control requirements set forth in applicable state and local regulations. Embarc's odor mitigation practices are intended to serve the following purposes:

- To ensure that air circulation resulting from Embarc retail operations does not impact our employees' health and welfare;
- To ensure that air circulation resulting from Embarc retail operations does not impact surrounding businesses and outdoor areas; and
- To ensure thoughtful operations that demonstrate a true commitment to the health and welfare of the City and its residents.

If Embarc receives an odor complaint, the General Manager will:

1. Log the date, time, source, contact information, and description of the complaint.
2. Within 30 minutes, the General Manager will identify the source of the odor by physically inspecting the facility for any unpackaged cannabis product that may be emitting odor. This includes inspection of all areas of the retail premises, including the secure storage area, the retail floor, and any other areas where cannabis products are featured or stored.
3. Upon identification of the source of odor, the General Manager will dispose of the cannabis product in a secure, air-tight waste disposal area and log the disposal in the track-and-trace system and the odor control log.
4. The General Manager will also physically inspect the odor control system, within 30 minutes of receiving an odor complaint, to ensure it is functioning properly.
5. If the General Manager identifies that the odor control system is malfunctioning, the General Manager will immediately contact the manufacturer.

The General Manager will determine if the issue can be addressed with the manufacturer over the telephone and, if not, will schedule the first available appointment with the manufacturer to visit the retail facility to physically inspect the odor control system. If the odor control system cannot be fixed, the General Manager will immediately place an order for the first available replacement part or new system.

The General Manager will immediately communicate the complaint and resolution to Embarc's facilities management team within 2 hours. The General Manager will discuss the source of the odor complaint or issue and its resolution with the retail team at the next team meeting to develop and implement procedures to prevent future odor complaints.

### **Public Consumption**

Embarc has clearly defined SOPs to ensure no public consumption surrounding its facilities, which are strictly enforced by both the Security Officers and retail staff.

Specifically, Embarc prohibits the consumption of cannabis or cannabis products at or on the premises, in the parking areas of the premises, or in those areas restricted under the provisions of California Health and Safety Code §11362.79.

This policy is enforced by rigorous monitoring of the dozens of surveillance cameras covering every inch of our parcel as well as by onsite Security Officers who are trained to prevent consumption in or around the premises, including but not limited to regular patrol of the premises. We will post clear and legible signs advising individuals that consuming cannabis of any kind is prohibited in public places.

If someone is consuming publicly, security immediately addresses the issue with a clear directive to cease consumption. If the behavior continues, patrons are warned that they will be banned from shopping at Embarc in the future. If, after being addressed by security, the consumption continues, Security Officers will notify the Police Department. To date, Embarc has never required law enforcement intervention regarding public consumption.

Security Officers will be aware of customers leaving the facility, as all products must exit the store in an easily identifiable exit bag. This allows Security Officers to utilize visual inspection and live surveillance camera feed monitoring to view customers exiting the facility. Because we will always have Security Officers with visual access to both our security monitors and exterior, such personnel will be aware of any individuals on our property and can respond immediately should public consumption occur.

While Embarc certainly controls its premises, in reality no operator has meaningful control over what

happens beyond the four boundaries of its property. As such, we complement our rigorous onsite monitoring and protocols with public education efforts to ensure that the community's cannabis consumers are aware of where they can and cannot consume cannabis in Sutter Creek. This educational information is intended to serve as an additional deterrent to public consumption.

Finally, deterring public consumption is part of actively monitoring for and ultimately preventing loitering, as further detailed below. It is coupled with onsite policies and procedures, including a prohibition on opening products onsite. By ensuring customers depart in a timely manner, loitering and on-premises consumption are avoided.

### **Loitering**

Embarc prohibits all loitering outside the facility and will notify the Police Department if anyone continues to loiter after all reasonable efforts to remove the individual(s) have been exhausted. Embarc will post signage noting age restrictions and the prohibition on loitering. Simply put, loitering will not be tolerated under any circumstances.

All employees will receive training and implement protocols to reduce the risk of disruptive, nuisance behavior and negative impacts on neighbors. This includes ensuring that customers immediately exit the premises upon completing their purchase.

Security and staff will be responsible for controlling patrons' conduct on the property. Security Officers will be aware of customers leaving the facility who are carrying the easily distinguishable exit bags and will monitor their exit from the premises. Because we will always have Security Officers with visual access to both our security monitors and exterior, such personnel will be aware of any individuals on our property.

If any of our neighbors or community members feel that loitering on our premises is causing a nuisance, we welcome them to reach out to our Community Liaisons, who will seek to resolve the

situation immediately. Additional protocols will be implemented to adequately meet the community's needs.

Importantly, our Security Officers will also conduct periodic neighborhood sweeps to ensure no littering, loitering, or other negative impacts on the neighborhood. However, if a member of the community is concerned about loitering, our Community Liaisons, along with Security Officers, will immediately address the situation in real time.

### **Littering**

We will use two primary methods to prevent and mitigate litter at our retail facility. The first method is providing ample waste receptacles for customers and staff. The second is regular employee litter checks and premises inspections.

In addition to these methods, we will adopt a strict no-littering policy for all employees and customers. Any employee found to be littering on the premises will first receive a verbal warning, followed by increasingly serious disciplinary actions.

We believe the best tool in the fight against littering is to give our patrons and employees ample places to properly dispose of their refuse.

In the public facing portions of our facility, we will have multiple waste receptacles. These receptacles will allow customers to properly dispose of their non-cannabis waste in landfill, recycling, and compost compartments, streamlining the disposal process. Similarly, Embarc will provide waste receptacles for non-cannabis waste in all back-of-house areas where only employees or authorized contractors will be present.

With ample access to proper receptacles, there will be no excuse for our employees not to dispose of waste properly. All cannabis product waste will be disposed of in compliance with all applicable State and local laws, regulations, ordinances, and other requirements, and as detailed in our Waste Management Plan. If a neighbor or community member

feels that litter is accumulating at or around our facility, our Community Liaisons will immediately address the issue.

### **Vehicle Traffic**

We do not anticipate significant impacts to vehicle traffic given the site's ample parking. We have nevertheless considered vehicular turning movements in relation to traffic flow, proximity to intersections, adequacy of sight distances, and overall circulation in the immediate vicinity. Should any impacts to vehicle traffic arise, Embarc will designate an employee to help manage customer flow and coordinate curbside activity as needed to ensure safe and orderly operations.

Fortunately, according to leading traffic studies cannabis retail uses closely mirror the trip generation statistics of banking uses. Meaning, we are confident our operations will not meaningfully increase nearby traffic more than the prior use at our chosen location.

Furthermore, Embarc's robust Buy Online, Pick Up In Store (BOPIS) program plays a meaningful role in reducing on-site dwell time and associated traffic impacts. Across our operations, BOPIS orders account for approximately 30% of total sales, with these customers typically completing their visit in just minutes. Notably, this percentage has increased consistently year over year since the program's launch, reflecting growing customer adoption of faster, more efficient purchasing options. This streamlined transaction model ensures that a significant portion of customers are in and out quickly, reducing congestion and limiting vehicle accumulation near the site.

In addition, we will continue to encourage use of online ordering and off-peak pickup times to further distribute customer traffic throughout the day. In situations of unexpected demand, we will actively promote express pickup options as convenient alternatives. In the event a community member raises a concern related to vehicular traffic, Embarc's leadership team will promptly

investigate and implement appropriate mitigation measures to ensure continued compatibility with the surrounding area.

### **Pedestrian Traffic**

Embarc is committed to preventing and addressing pedestrian traffic complaints at our facility through thoughtful design, proactive measures, and responsive customer service. Our facility has been designed to ensure efficient customer flow within the property, preventing pedestrian traffic from spilling beyond the premises or disrupting the surrounding neighborhood. In the exceedingly rare instance a large gathering of customers occurs, clearly delineated lines and designated waiting areas will ensure customers wait in an orderly fashion. Security Officers will actively patrol the area to maintain the flow of pedestrian traffic and ensure no disturbances occur.

Additionally, our Screening Lobby includes a seating and waiting area to accommodate customers when the Sales Area reaches capacity. Our Sales Area is equipped with a well-organized queue system to guide customers smoothly through the shopping and checkout process, with employees directing customers to exit the premises promptly. Signage inside and outside the store will help maintain order, preventing overcrowding or pedestrian spillover. Should pedestrian traffic remain an issue, we will engage an additional staff member to assist with managing the flow and offer incentives, such as BOPIS promotions, to encourage visits during non-peak hours.

During high-traffic periods like grand openings, holidays, or special annual events like 4/20, we will schedule additional security and staff members to intensify foot traffic control within and outside the store. To further streamline entry and reduce wait times, Embarc will deploy trained staff equipped with tablets to pre-register customers into our customer management platform while they are in line. This allows guests to complete required intake steps and establish their profiles in advance, significantly expediting the check-in process and

minimizing queue duration. Additional proactive measures, including a virtual queuing system, will further ensure that customer flow is managed efficiently, minimizing any inconvenience to the surrounding community.

In the event of a community concern, Embarc's General Manager will investigate and resolve the issue promptly. Our commitment to the neighborhood includes periodic neighborhood sweeps to ensure that pedestrian traffic does not result in littering, loitering, or other disturbances, helping us maintain a positive relationship with our neighbors.

### **NOISE CONTROL MEASURES**

Embarc takes several precautions and implements a variety of measures guaranteed to combat and mitigate excessive noise. Embarc will never produce excessive or unnecessary noises that would detrimentally impact the public health, comfort, safety, welfare, or prosperity of the surrounding neighborhood and Sutter Creek community.

All noise producing activities, including but not limited to construction, landscaping, and motor vehicle operation, will comply with all Sutter Creek noise ordinances. No sound production or reproduction systems inside the facility will be maintained at a volume level higher than what is necessary for the convenient hearing of persons present, including receiving activities. We will prohibit the use of horns or signal devices on any of our company or employee vehicles, except as a danger signal or to give warning.

To minimize our neighborhood impact during renovation, construction activities will only occur with a special permit from the City and between reasonable or preapproved hours. The premises, including the parking lot, will be monitored under constant video surveillance, and routinely patrolled by our Security Officers to ensure no inappropriate noise is produced.

If any person or vehicle is identified as causing a disturbance or being excessively noisy, that individual will immediately be escorted off the premises and, if necessary, reported to law enforcement. We will ensure all motor vehicles on our premises adhere to appropriate sound level decibels. Motor vehicles exceeding established limits will be asked to leave the premises by our security team. Our Security Officers will also work to ensure no motor vehicle on our premises is left idling.

Embarc has developed a comprehensive approach to nuisance avoidance centered around proactive business management, easy-to-follow policies and procedures for its onsite team, and meaningful outreach to the surrounding neighborhood to ensure neighbors know whom to contact with questions or concerns. This approach is driven by lessons learned from existing operations and has proven effective in real-time. We welcome feedback or input from the City and our neighbors and view this plan as a living, breathing document. We will continue to evolve and adapt as we grow and ensure our policies remain rooted in best practices as our industry evolves.

## **COMPATIBILITY WITH SURROUNDING USES**

The proposed location at 11 Ridge Road is situated within the C-2 General Commercial zone and is surrounded by similarly designated commercial zones. There are no residential-only zoning districts in the immediate vicinity, and the surrounding area is characterized by an established mix of retail, service-oriented, and neighborhood-serving uses consistent with an active commercial corridor.

Adjacent parcels within the surrounding block reflect this compatible commercial environment, including a gas station and convenience store, Los Hermanos Mexican Restaurant, Sutter Hill Smoke and Vape, the Summit Business Center, and several vacant storefronts. This mix of uses demonstrates a well-established commercial setting in which

Embarc's proposed retail operation will integrate naturally without altering the character of the area.

The proposed location complies with sensitive use buffers outlined in state law. 11 Ridge Road is not located within 600 feet of any school, daycare facility, or youth-oriented use. These factors reinforce the site's suitability for the proposed use.

Embarc's operational model is specifically designed to integrate seamlessly into commercial environments such as this one. The proposed tenant improvements are limited in scope, consisting primarily of interior reconfiguration and minimal exterior enhancements such as signage and cosmetic upgrades. These improvements will be completed in compliance with all City requirements, within approved construction hours, and over a short duration, minimizing any temporary disruption to neighboring businesses.

Ongoing operations will be discreet and consistent with surrounding retail uses. All cannabis products arrive pre-packaged, labeled, and sealed, meaning the business does not generate noise, odor, or other externalities commonly associated with other cannabis uses. As a result, the day-to-day operation will function similarly to other regulated retail establishments in the area.

The exterior design has been intentionally developed to align with surrounding uses. The storefront will maintain a clean, neutral, and professional appearance consistent with neighboring businesses. Window treatments will maintain a cohesive streetscape, ensuring no visibility of cannabis products or activities from the public right-of-way.

Beyond compatibility, Embarc's presence will contribute positively to the surrounding area. The activation of a currently vacant building will support Sutter Creek's ongoing revitalization efforts, increase foot traffic to nearby businesses, and strengthen the commercial fabric of the corridor.

Dispensaries are known to generate consistent customer traffic, which can have a complementary effect on neighboring businesses by increasing visibility and overall activity in the area.

Embarc has successfully operated in 16 communities throughout California, consistently integrating into similar neighborhood-serving commercial corridors without incidents related to community compatibility, youth access, or co-tenancy concerns. This track record demonstrates our ability to operate responsibly while enhancing the surrounding environment through professionalism, active management, and a strong security presence.

The proposed location is discreet, accessible, and well-positioned within an established commercial corridor, making it appropriate for a cannabis retail use without impacting sensitive areas or community landmarks. Embarc's approach reflects the continued normalization of regulated cannabis retail as part of a broader mix of neighborhood-serving businesses, where customers incorporate visits into routine activities in a safe, orderly, and well-managed environment.

As legal dispensaries become more prevalent and the stigma surrounding cannabis use continues to fade, cannabis retail is increasingly integrated into everyday health and wellness routines. For this reason, ensuring an easy and convenient customer experience is a top priority when selecting an appropriate location.

No longer viewed as a novelty or out-of-the-ordinary activity, visiting a dispensary has become part of a typical consumer's routine—similar to other neighborhood-serving retail errands. The proposed location at 11 Ridge Road is well-positioned to serve as this convenient and accessible destination for Sutter Creek residents, further reinforcing its compatibility within this established commercial corridor.

Through this combination of appropriate zoning, compatible surrounding uses, thoughtful site selection, and a proven operational model, Embarc is confident that the proposed dispensary will not only be compatible with surrounding uses but will contribute meaningfully to the continued vitality and success of one of Sutter Creek's primary commercial corridors.