

OPERATIONS PLAN

Prepared by:

**SAN LUIS OBISPO SELECTS, INC.
3919 Huasna Road
Arroyo Grande, CA 93420**

OPERATIONS PLAN

SLO Selects
Arroyo Grande, California

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1.0 INTRODUCTION

San Luis Obispo Selects, Inc. (SLO Selects) has prepared this Operations Plan for commercial cannabis activities located at 3919 Huasna Road, Arroyo Grande, California 93420 (Project Site). SLO Selects will implement the activities in two phases. Phase I is expected to be implemented in September 2019. Phase II implementation is expected in August 2020.

Phase I implementation will include the following:

1. three (3)-acre canopy of outdoor cannabis cultivation;
2. installation of eight (8) 600-square-foot (SF) modular trailers (4,800 SF total) for cannabis processing area as an ancillary use to cultivation;
3. installation of a 960 SF modular trailer for a non-storefront delivery service and additional cannabis processing;
4. relocation of two existing 5000-gallon water tanks and installation of one new 5,000-gallon water tank;
5. installation of security fencing, driveway gates, motion sensor lighting, security cameras, and ancillary equipment for the outdoor cultivation area;
6. installation of a septic system and restroom;
7. driveway improvements; and
8. development of the parking lot.

Phase II implementation will include the following:

1. 33,600 SF greenhouse to cultivate a 22,000 SF mixed-light/ indoor canopy;
2. 8,200 SF greenhouse for a cannabis nursery; and
3. 960 SF area for non-volatile manufacturing activities.

The commercial cannabis activities listed above are herein collectively referred herein as the "Project".

The Operations Plan discusses facility design and activities associated with the Project. Included and attached to this document are the Site Plans, Security Plan, Odor Management Plan, Waste Management Plan, Cultivation Plan, and Inventory Management Plan.

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1.1 REGULATORY COMPLIANCE

The Operations Plan is intended to comply with the following agency permit requirements and regulations:

- County of San Luis Obispo (County) Land Use Ordinance - Title 22 of the County Code, Section 22.040.
- California Department of Food and Agriculture (CDFA) – Medium Indoor, Small Outdoor, and Nursery Cultivation Licenses. California Code of Regulations, Title 3, Division 8, Chapter 1.
- California Bureau of Cannabis Control (BCC) Type 9 – Non-Storefront Retailer License. California Code of Regulations, Title 16, Division 42, Sections 5000-5904.
- California Department of Public Health (CDPH) Type 6 License. California Code of Regulations, Title 17, Division 1, Chapter 13. Manufactured Cannabis Safety.

Any changes to this Operations Plan will be submitted to the County and any other agencies with regulatory oversight.

2.0 ORGANIZATIONAL STRUCTURE

2.1 CONTACT INFORMATION

San Luis Obispo Selects
Krista Koenig – Owner/ General Manager
3919 Huasna Road
Arroyo Grande, CA 93420
(831) 588-6214

2.2 RESPONSIBILITY OF MANAGER

SLO Selects' Owner and General Manager or their authorized designee will be responsible for overseeing the daily activities. The General Manager may elect to authorize another person or persons to act on their behalf. General Managers are those individuals who, directly or indirectly, are engaged in the management or oversight of SLO Selects' activities. Additionally, the General manager may elect to authorize another person or persons to act in the various management capacities as discussed below.

2.2.1 COMPLIANCE MANAGER

The Compliance Officer is responsible for regulatory compliance, reporting, agency notifications, and ensuring that inventory is tracked and traced according to this plan and state guidelines. In the event of a regulatory audit, the Compliance Officer will be responsible for providing agencies with requested documents.

2.2.2 SECURITY MANAGER.

The Security Manager is responsible for ensuring that security measures are up to date and systems are functioning properly. The Security Manager will be responsible for notifying state and local agencies of any security breaches.

2.2.3 INVENTORY CONTROL MANAGER

The Inventory Control Manager is responsible for ensuring inventory is entered into the California Cannabis Track and Trace (CCTT) Metrc system. The Inventory Control Manager will be responsible for coordinating and tracking the delivery of cannabis products. The Inventory Control Manager will also be responsible quality assurance, diversion prevention, and disposal of expired, deteriorated, or damaged cannabis products.

2.2.4 EMPLOYEE TRAINING MANAGER

The Employee Training Manager is responsible for ensuring that employees authorized to track and trace cannabis products using the CCTT Metrc system are trained per state guidelines. They will also be responsible for ensuring that employees are trained on their roles and responsibilities, compliance, security, and record keeping.

2.2.5 RECORD KEEPING MANAGER

The Record Keeping Manager is responsible for keeping records of compliance notifications and actions, inventory control and tracking, quality assurance, security breaches, employee training, financial records, and any other record logs required by the state and local agencies.

2.2.6 FACILITY LIAISON.

The Facility Liaison is responsible for correspondence with the public and responding to agency requests for inspections.

2.3 STAFFING

Following implementation of Phase I and Phase II, SLO Selects proposes to have up to 20 full-time and part-time (seasonal) employees. The average number of daily employees is 10. Employees will have multiple job duties depending on the work needing to be completed. The General Manager will assign employees to work in designated areas regarding cultivation activities (i.e. outdoor, indoor, and nursery), processing, delivery service, and manufacturing. Additionally, there will be seasonal employees to assist with trimming and packaging the harvested cannabis, including making nonmanufactured cannabis products (i.e. pre-rolled joints and kief).

2.4 REQUIREMENTS FOR ALL EMPLOYEES

SLO Selects employees will be 21 years of age or older. All employees will be required to go through an employment review process that includes being interviewed by the General Manager and providing employment references.

2.5 TRAINING

Once hired, employees will be required to go through training pertaining to their authorized job duties. SLO Selects will develop training procedures as part of its quality assurance program. Training will follow federal, state, and local agency requirements and will include, but is not limited to, the following:

1. laws and regulations regarding adult use and medical use cannabis;
2. job specific procedures for cultivation, processing, delivery service, and manufacturing;
3. inventory tracking;
4. security and emergency procedures;
5. personal protective equipment, as needed;
6. compliance;
7. record keeping; and
8. quality assurance and control.

Training requirements for the above-mentioned topics are discussed further below and in the associated attachments of this Operations Plan.

3.0 FACILITY OPERATIONS

3.1 HOURS OF OPERATION

Hours of operation will be from 7 a.m. to 9 p.m., Monday through Sunday, for all activities occurring onsite. All visitors entering and exiting the site will occur during the proposed hours of operation.

3.2 FACILITY LAYOUT

The layout of the Project Site and proposed Project activities can be seen in Attachment A – Site Plans.

3.3 CULTIVATION

SLO Selects will have outdoor cultivation, mixed-light indoor cultivation, and a retail nursery. Additionally, SLO Selects will have processing as an ancillary use to dry, trim, cure, store, package, and label the harvested cannabis, which includes producing non-manufactured cannabis products.

3.3.1 OUTDOOR CULTIVATION AREA

The outdoor cannabis cultivation area will include up to 3-acres of canopy separated into 10,000 SF areas. The outdoor cultivation area will be surrounded by fencing and screening material. Plants will be placed in rows with enough aisle space to allow personnel access to the plants. A combination of potting soil and natural soil will be used for the grow media. SLO Selects will utilize raised mounds of potting soil that directly overlay the ground. Pots are not proposed for the outdoor cultivation area. Plants will be watered using drip irrigation.

Outdoor cultivation activities will occur from mid to late June through early November, approximately. This period represents the typical outdoor growing season. SLO Selects proposes to stagger outdoor planting over a couple week period and will also cultivate plants that have varying flowering periods. This process will minimize the number of plants in the mature flowering phase and will also minimize the number of plants being harvested at one time.

3.3.2 MIXED-LIGHT / INDOOR CULTIVATION AREA

SLO Selects will construct a 33,600 SF greenhouse for mixed-light indoor cultivation. The greenhouse will be approximately 140-feet wide by 240-feet long. The total canopy space of the greenhouse will occupy an area of 22,000 SF. To minimize disturbance on prime soils, the greenhouse will not have a concrete floor and grading is not proposed. SLO Selects will anchor the greenhouse supports to the ground. The interior ground portion of the greenhouse will be covered with landscaping fabric and bark, mulch, or similar material to minimize impacts to the existing soil. SLO Selects will utilize raised beds filled with potting soil as the grow media.

SLO Selects will utilize natural sunlight to the maximum extent feasible for the indoor greenhouse; however, additional supplemental lighting will be needed on days when there is not enough light for optimal growth and flower production. Supplemental lighting in the indoor greenhouse will utilize 1,000-watt light-emitting diode (LED) fixtures installed above the canopy areas. If supplemental lighting is required at night, blackout tarps will be used to cover the greenhouse to ensure that lighting is not visible from outside the greenhouse.

Mixed-light indoor cultivation will occur year-round. SLO Selects proposes to stagger planting in the greenhouse to minimize the number of plants being harvested at one time. Harvesting and replanting will occur two to three weeks.

3.3.3 NURSERY

SLO Selects will construct an 8,200-sf greenhouse to be used for retail nursery operations. The greenhouse will be approximately 82-feet wide by 100-feet long. The location of the nursery greenhouse is shown on the Site Plans in Attachment A. To minimize disturbance on prime soils, the greenhouse will not have a concrete floor and grading is not proposed. SLO Selects will anchor the greenhouse supports to the ground. The interior ground portion of the greenhouse will be covered with landscaping fabric and bark, mulch, or similar material to minimize impacts to the soil.

The greenhouse will be used to cultivate plants in the vegetative phase and will include mother plants, teens, clones, and a research and development area used to create or test new cannabis genetics. Mother plants are plants used to create clone stock. Teens are clones that are taller and more developed than clones and are contained pots. Mothers and teens will be grown in pots with filled with potting soil. Clones will be propagated in a soilless growing media, such as rockwool or cubes made of peat, coco, or other inert material. SLO Selects proposes to use greenhouse tables for teens, and a tiered racking system for clones.

SLO Selects will use natural sunlight to the maximum extent feasible for nursery operations; however, additional supplemental lighting will be needed to keep plants in the vegetative state and to allow for maximum plant health. Supplemental lighting in the nursery greenhouse will utilize 1,000-watt high intensity discharge bulbs installed above the mother and teen plants. In addition, fluorescent or LED lights will be used for clones. Clones will be placed on racks and the fluorescent or LED lights will be attached to the racks above the clones.

If supplemental lighting is required at night, blackout tarps will be used to cover the greenhouse to ensure that lighting is not visible from outside the greenhouse. Nursery operations will occur year-round.

3.3.4 PROCESSING TRAILERS

SLO Selects will have eight modular trailers for processing cannabis harvested from the outdoor and mixed-light indoor cultivation areas. The location of the trailers are shown on the Site Plans in Attachment A. SLO Selects will stagger planting and harvesting times for the mixed-light indoor and outdoor cultivation areas to ensure there is sufficient space for processing.

SLO Selects will designate a room within the delivery trailer to allow for additional processing of the cannabis flowers. Once trimmed, the flowers will be packaged and stored in one of the eight modular trailers. All cultivated cannabis will be tracked and traced in accordance with CDFA regulations. Track and trace is discussed in Attachment F – Inventory Management Plan.

3.3.5 FERTILIZER AND PESTICIDE STORAGE

SLO Selects will use fertilizers and pesticides as necessary for cultivation activities. Fertilizers and pesticides will be stored separately in a locked storage container. Fertilizers and pesticide management is discussed further in Attachment E – Cultivation Plan.

3.4 MANUFACTURING

SLO Selects Manufacturing activities will occur in a 960 SF modular trailer as shown on the Site Plans in Attachment A. Manufacturing activities will include non-volatile manufacturing of extracts commonly referred to as “dry sift” or “kief”, “ice-water hash”, and “rosin”. Descriptions for each process is discussed further below. SLO Selects will have separate areas for producing dry sift, ice-water hash, rosin, and storage of the starting material and finished product. SLO Selects has not determined specific equipment for non-volatile manufacturing operations. As such, SLO Selects will submit building, mechanical, and equipment specifications to the County for review and approval during the building permit process.

Dry sift is produced through mechanical means in which a machine is used to tumble the trim and flowers. The tumbling allows the trichomes, or resinous glands on the trim and flower, to pass through a mesh screen. The trichomes are collected and then can be packaged for retail sale or can be further processed into rosin.

Ice-water hash is produced through mechanical means with a washer machine, mesh screen, ice, and water. It is similar to dry sift in which the trichomes pass through a mesh screen and are collected. However, there are additional steps in the process such as collecting trichomes by size and curing the material to allow water to evaporate. The resulting hash can then be packaged for retail sale or can be further processed into rosin.

Rosin is produced using a starting material of either flowers, dry sift, or ice-water hash. The starting material is inserted into a micron bag. A machine using high pressure and low heat presses the bag and squeezes out resinous sap. The resinous sap is then collected, cured, and packaged. The process of making rosin does not use any chemicals or solvents.

All manufactured cannabis will be sold to a licensed distributor and tested in compliance with CDPH requirements. All manufactured products will comply with CDPH requirements for batch production and track and trace requirements, which are discussed in Attachment F – Inventory Management Plan.

3.5 NON-STOREFRONT DELIVERY SERVICE

SLO Selects will deliver cannabis products produced onsite. Delivery service operations will occur in a 960 SF modular trailer designated for delivery operations as shown on the Site Plan in Attachment A. Cannabis products for delivery will be stored in locked safes within a designated room. Orders for cannabis products will be taken out of the safe and placed in secure delivery bags or containers prior to leaving the facility. SLO Selects proposes to send out the delivery vehicle once per day and deliver cannabis products that have been pre-ordered the day before. Delivery procedures are discussed further in Attachment F – Inventory Management Plan.

3.6 DOORS, ENTRY, AND EXIT

All doors to authorized access areas will require a key, keycode, or access code for entry. Only authorized employees will be given access to areas where they authorized to work. Visitors will not be given keys, keycodes, or access codes at any time. Entry, exit, and authorized access areas are discussed in Attachment B – Security Plan.

3.7 SITE ACCESS

Employees and visitors will enter and exit the Project Site through the two driveway gates located at the front of the property. All employees and visitors will be required to sign in and out upon entry and exit. Employee and visitor access are discussed further in Attachment B – Security Plan.

3.8 PARKING

SLO Selects will have 14 designated parking spaces located at the Project Site, which includes one van accessible parking space in compliance with the Americans with Disabilities Act (ADA). Parking is for employees, contractors, agency inspectors, and visitors. Employees and seasonal workers used for harvesting and trimming will carpool to the Project Site to maximum extent feasible. The Project Site has ample space to allow for delivery vehicles and additional parking as needed.

3.9 DELIVERIES

Deliveries of non-cannabis goods (e.g. fertilizers, office products, etc.) will occur during operating business hours. All vehicles making deliveries of non-cannabis products will make deliveries to the driveway entrance gate. Delivery drivers will be escorted through the gate by authorized personnel and deliveries will be made to the appropriate facility or to the parking area. All deliveries will be coordinated with the General Manager or their authorized designee

Deliveries and transportation of cannabis products to and from the Project Site will occur during operating business hours. Delivery vehicles of cannabis products will enter through the driveway entrance gate and deliveries will be made to the appropriate facility. Only authorized employees will be present when cannabis products are being delivered.

Delivery drivers will be required to sign in and out upon entry and exit. Deliveries of cannabis products will be accompanied by a transportation manifest and will be tracked and traced according to state requirements.

3.10 RESTROOMS

SLO Selects will install a restroom at the Project Site as shown on the Site Plans in Attachment A. This will include the installation of a septic system and leach lines. The restroom will be ADA accessible. Additionally, portable restrooms can be delivered to the Project Site during harvest, as needed.

3.11 LIGHTING AND SIGNAGE

SLO Selects will have motion activated lighting throughout the Project Site to allow for safe operations and to deter potential trespassers. Motion activated lighting is shown on the Security Site Plan and discussed further in the Attachment B. All lighting will be shielded downward to prevent offsite lighting and glare.

SLO Selects does not propose any signage other than security signage stating the site is under video surveillance.

3.12 PROPERTY MAINTENANCE

SLO Selects will keep the Project Site in a clean and safe condition by, at a minimum, performing all of the following tasks:

1. cleanup and dispose of all trash, litter, and debris at the end of each business day;
2. keep driveways, sidewalks, landscaping, and adjacent streets clear and clean of trash and debris;
3. provide motion sense lighting at the Project Site to ensure the safety of the public and the employees;
4. perform facility and equipment inspections and maintenance on a regularly scheduled basis; and
5. otherwise operate in a manner that does not create or result in any significant adverse impacts at the Project Site or its adjacent areas.

3.13 ENERGY USE

Power is provided to the Project Site by overhead powerlines services by Pacific Gas and Electric. There are two electrical meters that serve the proposed cultivation area. Power will be used for growing lights, heating and cooling equipment, manufacturing equipment, and electrical needs for typical office use. SLO Selects' projected energy use is summarized in Table 1 below. This estimate is based on proposed equipment and average electrical use associated with small businesses (i.e. manufacturing and delivery service). While this is an estimate, actual energy use can vary depending on final selection of equipment and factors such as outside ambient weather conditions.

Table 1. Estimated energy use by activity.

Activity	Estimated kWh
Mixed-Light Indoor	226,440
Nursery	68,040
Outdoor (water pump)	5,000
Manufacturing	15,000
Delivery Service	10,400
Total	324,880

To minimize energy use, SLO Selects will implement the following:

1. use energy efficient lighting fixtures for normal business operations;
2. use light emitting diode (LED) lighting fixtures for cultivation activities, to the maximum extent feasible; and
3. use energy efficient mechanical equipment, such as air conditioning units; and
4. turn off equipment when not in use.

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3.14 WATER USE AND MANAGEMENT

The Project Site is served by an existing well with a 12-inch casing and a 10-horse power pump that pumps approximately 140 gallons per minute. SLO Selects will have three 5000-gallon water storage tanks for Project activities. The Project Site is located within the Santa Maria Groundwater Basin. No water will be imported to the Project Site.

SLO Selects projected water use by activity is summarized in Table 2 below. Estimates for cultivation activities are based on previous experience irrigating cannabis plants. While this is an estimate, actual water use can vary depending on variables, such as weather, the number of plants under production, and the number of employees onsite.

Table 2. Estimated water demand by activity.

Use	Gallons (per day)	Days of Operation	Gross Demand (gallons/year)	Gross Demand (acre-feet/year)
Outdoor Cultivation (3 acres)	5,000	150	750,000	2.30
Mixed-Light Indoor Cultivation	800	270	216,000	0.66
Nursery	300	365	109,500	0.37
Manufacturing	100	100	10,000	0.03
Non-Storefront Delivery and Ancillary Use (e.g. restroom)	120	365	43,800	0.13
Total	6,320		1,129,300	3.47

In order to minimize water use, SLO Selects will implement the following:

1. irrigate cultivation areas using drip irrigation;
2. develop procedures for inspecting and maintaining all irrigation equipment; and
3. use low flow toilets and sink aerators.

3.15 SECURITY, VIDEO SURVEILLANCE, AND ALARM SYSTEM

SLO Selects will implement County, CDFA, BCC, and CDPH regulations regarding security procedures, video surveillance, and alarm systems. Security measures are discussed in Attachment B – Security Plan.

3.16 WASTE MANAGEMENT

SLO Selects will comply with County, CDFA, BCC, and CDPH agency regulations regarding waste management. Waste management is discussed in Attachment C – Waste Management Plan.

3.17 ODOR MANAGEMENT

SLO Selects will implement odor control systems in the mixed-light indoor cultivation greenhouse, processing trailers, manufacturing trailer, and delivery service trailer. The outdoor cultivation area is within the 300-foot setback required by the County. SLO Selects will comply with County regulations regarding odor mitigation. Odor management is discussed in Attachment D – Odor Management Plan.

3.18 CULTIVATION PLAN

SLO Selects will comply with County and CDFA agency regulations regarding cultivation. Cultivation activities are discussed in Attachment E – Cultivation Plan.

3.19 INVENTORY TRACKING

Inventory for cultivation, nursery, manufacturing, and delivery service will be tracked and traced electronically using software compatible with the CCTT Metrc system. SLO Selects has prepared an Inventory Management Plan in compliance with County, CDFA, BCC, and CDPH agency regulations regarding inventory control and tracking. See Attachment F – Inventory Management Plan.

3.20 QUALITY ASSURANCE AND CONTROL

SLO Selects will develop procedures as part of its operations to ensure compliance with federal, state, and local agency requirements; and to ensure that cannabis products produced or sold by SLO Selects exceed client expectations. Quality assurance and control will be addressed by developing procedures for the following:

1. plant inspection;
2. cannabis product handling and inspection;
3. equipment and facility inspection;
4. inventory tracking;
5. manufacturing processes;
6. transportation safety;
7. security;
8. laboratory sampling and testing;
9. packaging and labeling; and
10. employee training.

3.21 RECORD KEEPING

As part of the Operations Plan, and in compliance with state and local agency regulations, SLO Selects will develop reporting forms that include, but are not limited to, the following:

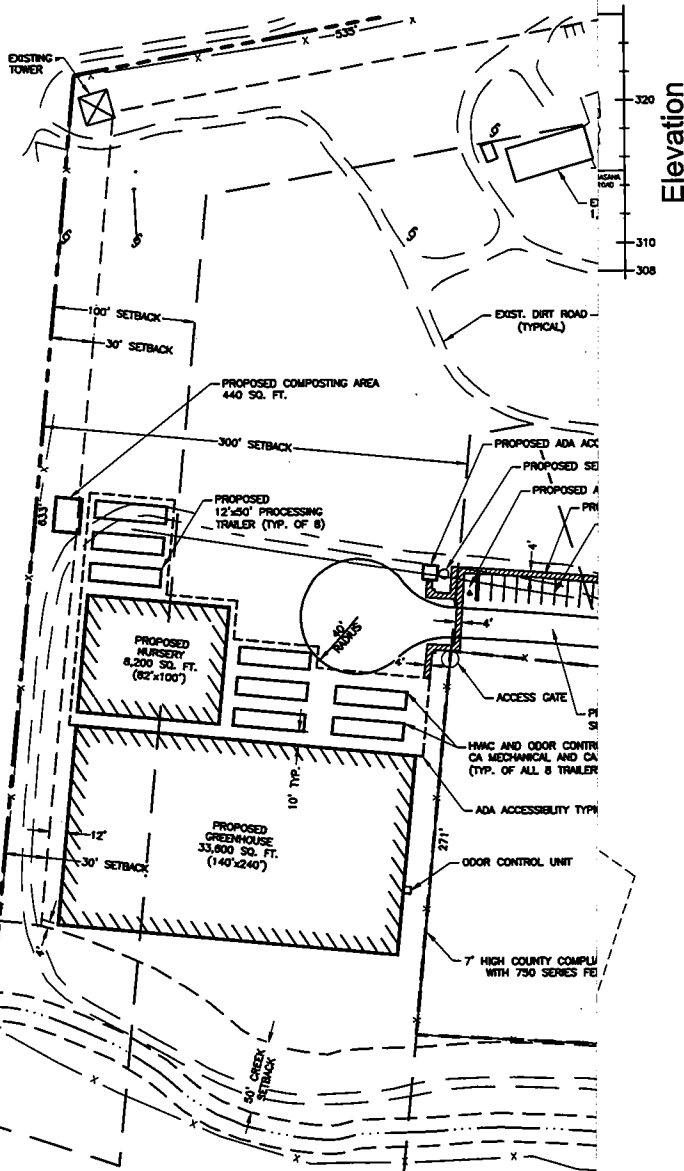
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1. financial records including, but not limited to, bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration (formally Board of Equalization) under Title 18 California Code of Regulations sections 1698 and 4901;
2. personnel records, including each employee's full name, social security or individual tax payer identification number, date employment begins, and date of termination of employment if applicable;
3. training records, including but not limited to the content of the training provided, and the names of the employees that received the training;
4. contracts with other licensees regarding commercial cannabis activity;
5. permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity;
6. security records, except for surveillance recordings which are required to be kept for 30 days per County regulations;
7. records relating to the composting or destruction of cannabis goods;
8. documentation for data or information entered into the track and trace system;
9. all other documents prepared or executed by SLO Selects or their authorized designee in connection with cannabis activities;
10. facility and equipment maintenance;
11. incident notification for security breaches and operational complaints (e.g. odor complaint);
12. any other records discussed in the attachments of this Operations Plan and/ or required by local or state agencies.

SLO Selects' records will be legible and stored in a location that is protected from debris, moisture, contamination, hazardous waste, fire, theft, and alteration by unauthorized persons.

SLO Selects will keep all records for a minimum of seven years, or as required by the County or agencies with regulatory oversight. Records will be available in either hard copy or electronic format for review by agency personnel upon request. Only the General Manager or their authorized designee will have access to records.

ATTACHMENT A – SITE PLANS



LEGEND

- X — EXISTING FENCE
- X — EXISTING EDGE AC PAVING
- X — EXISTING UTILITY POLE
- X — EXISTING WELL
- X — EXISTING WATER TANK (5,000 GALLONS)
- X — PROPOSED WATER TANK

NEW STEEL WATER
TANK W/ 4" LINE
PER CAL FIRE



SITE PLAN

Elevation



VICINITY MAP

NO SCALE



KEY MAP

SCALE: 1" = 800'

PROJECT DATA

1. PROJECT ADDRESS: 3919 HUASANA RD.
ARROYO GRANDE, CA 93420
2. LOT SIZE: 245,939 SQFT (56.5 AC)
3. ASSESSOR'S PARCEL NO.: 047-091-005
4. ZONING: AG
5. PROPOSED USE: CANNABIS CULTIVATION, RETAIL NURSERY,
NON-STOREFRONT DELIVERY, NON-VOLATILE
MANUFACTURING AND ANCILLARY PROCESSING
6. WATER SUPPLY: PRIVATE WELL
7. SEWAGE DISPOSAL: SEPTIC
8. GAS: SOUTHERN CALIFORNIA GAS CO.
9. ELECTRICITY: PACIFIC GAS & ELECTRIC
10. TELEPHONE: AT&T
11. CABLE: CHARTER CABLE
12. FEMA FLOOD ZONE: ZONE X, ZONE A

PROJECT NOTES

1. TOPOGRAPHIC INFORMATION SHOWN ON THIS MAP IS BASED ON A SURVEY PERFORMED BY GARING TAYLOR & ASSOCIATES IN NOVEMBER 2018.

ABBREVIATIONS

ABAN	ABANDONED	PUE	PUBLIC UTILITY EASEMENT
AC	ASPHALT CONCRETE	P	PROPOSED
CL	CENTERLINE	PVC	POLYVINYL CHLORIDE
ELEC	ELECTRIC	S	SLOPE
ESMT	EASEMENT	SD	STORM DRAIN
EX	EXISTING	SDMH	STORM DRAIN MANHOLE
FF	FINISHED FLOOR	SS	SANITARY SEWER
FG	FINISHED GRADE	SSCO	SANITARY SEWER CLEANOUT
FL	FLOW LINE	SSMH	SANITARY SEWER MANHOLE
FS	FINISHED SURFACE	S/W	SIDEWALK
GR	GRATE	TC	TOP OF CURB
HP	HIGH POINT	TW	TOP OF WALL
IE	INVERT ELEVATION	TYP	TYPICAL
LAT	LATERAL	WL	WATER LINE

DEVELOPMENT PLAN

FOR

LOT 19

LOT 19 OF BRANCH TRACT,
PER THE MAP RECORDED IN BOOK 01 OF MAPS AT PAGE 32,
COUNTY OF SAN LUIS OBISPO, STATE OF CALIFORNIA.

ARROYO GRANDE, CALIFORNIA

PREPARED FOR:
Owners/Applicant:

KOENIG
3919 HUASANA RD.
ARROYO GRANDE, CA 93420
(831) 588-6214

PREPARED BY:
Engineer:

GARING TAYLOR & ASSOCIATES
141 S. ELM STREET
ARROYO GRANDE, CA 93420
(805) 489-1321
JEFFREY J. EMRICK, P.E.

GTA NO.: 18-713
PLOT DATE: 3/26/19
FILE NAME: SITE PLAN.DWG



GARING, TAYLOR & ASSOCIATES, INC.
CIVIL ENGINEERS SURVEYORS PLANNERS

141 SOUTH ELM STREET · ARROYO GRANDE, CA 93420 · (805) 489-1321

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ATTACHMENT B – SECURITY PLAN

SECURITY PLAN
(Confidential – Not for Public Viewing)

Prepared by:

SAN LUIS OBISPO SELECTS, INC.
3919 Huasna Road
Arroyo Grande, CA 93420

SECURITY PLAN

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APPENDIX A: SECURITY SITE PLAN

SECURITY PLAN

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1.0 INTRODUCTION

San Luis Obispo Selects, Inc. (SLO Selects) has prepared this Security Plan for commercial cannabis activities located at 3919 Huasna Road, Arroyo Grande, California 93420 (Project Site). Commercial cannabis activities will include the following:

1. 3-acre canopy of outdoor cannabis cultivation;
2. 33,600 square foot (SF) greenhouse to cultivate a 22,000 SF mixed-light/ indoor canopy;
3. 8,200 SF greenhouse for a cannabis nursery;
4. 4,800 SF of cannabis processing area as an ancillary use to cultivation;
5. 960 SF area for non-volatile manufacturing activities; and
6. 960 SF area for a non-storefront delivery service.

This Security Plan has been prepared in compliance with the San Luis Obispo County Planning and Building Department (County), San Luis Obispo County Sheriff's Department (Sheriff), California Department of Food and Agriculture (CDFA), Bureau of Cannabis Control (BCC), and California Department of Public Health (CDPH) cannabis licensing regulations. The cannabis activities will be implemented in two phases. SLO Selects will submit an updated security plan to the appropriate agency with regulatory oversight upon implementation of each phase. SLO Selects will notify these agencies and any other agencies with regulatory oversight of any substantial changes to this Security Plan.

1.1 EMERGENCY CONTACT AND FACILITY LIAISON

San Luis Obispo Selects
Krista Koenig – Owner/ General Manager
3919 Huasna Road
Arroyo Grande, CA 93420
(831) 588-6214

1.2 ROLES AND RESPONSIBILITIES

The General Manager or their authorized designee will serve in the following roles:

- 1) Security Manager,
- 2) Compliance Officer,
- 3) Employee Training Manager, and
- 4) Record Keeping Manager.

The roles and responsibilities listed above are discussed in the associated Operations Plan.

2.0 SECURITY MEASURES

The following section addresses physical security measures, alarm and video surveillance systems, and operational measures to ensure security at the Project Site.

2.1 PHYSICAL SECURITY MEASURES

SLO Selects will impose physical security measures that comply County, Sheriff, CDFA, BCC, and CDPH requirements. Physical measures include, but are not limited to, physical barriers such as fencing, walls, and secure doors that restrict access to the public and unauthorized personnel. All employees and

2.1.1 PERIMETER SECURITY

Employee and visitor access to the Project Site will be through a single point of entry located at the driveway gate. The Project Site will have two electronic gates at the driveway entrance. The gates will require keycode or keypad entry. Only authorized employees will have access to enter through the gate. All employees and visitors will be required to sign in and out upon entering and exiting the Project Site.

The outdoor cannabis cultivation area will have a 7-foot high chain-link fence surrounding the perimeter. The fence will be lined with mesh fabric or other County approved material that provides screening. Fencing will be maintained and inspected as part of the facility inspection process. There will be one entry and exit gate located at the cultivation area. The gate will remain locked and only authorized personnel will have access.

2.1.2 GREENHOUSES

The greenhouse walls will be constructed of durable material that will prevent unauthorized persons from entering. The greenhouses will have doors that require a keycard and/or keypad code to enter. Only authorized employees will have access to greenhouses.

2.1.3 STORAGE AND PROCESSING AREAS

Storage and processing will occur in modular trailers with solid walls. All entry and exit doors to the processing and storage trailers will require a keycard and/or keypad code that can only be accessed by authorized employees. Employees will only be given access to areas where they are authorized to work.

2.1.4 MANUFACTURING AND DELIVERY SERVICE

Manufacturing and delivery service operations will occur in separate modular trailers with solid walls. All entry and exit doors to the manufacturing and delivery service trailers will require a keycard and/or keypad code that can only be accessed by authorized employees. Employees will only be given access to areas where they are authorized to work.

2.1.5 SAFES, SECURITY ROOM, AND RECORDS

Safes used for monetary storage will be located in a secure room within the delivery service trailer. Safes will be anchored to the floor to ensure they can't be removed. Only the General Manager or their authorized designee will have access to rooms containing safes.

Security surveillance footage will be stored in a secure room within the delivery service trailer. Surveillance footage will be recorded on a hard drive. The hard drive will be stored in a tamper-proof safe or compartment. Only the General Manager or their authorized designee will access to secure room and the safe or locked compartment containing security footage.

Confidential records and records required by regulatory agencies will be stored in a secure room within the delivery service trailer. Records will be stored in a locked cabinet, safe, or similar equipment that provides protection from debris, moisture, contamination, hazardous waste, fire, and theft.

2.1.6 DOORS AND LOCKS

All entry, exit, and interior doors to limited-access areas will require a keycard and/or keypad code that can only be accessed by authorized employee personnel, except for restroom doors. All door locks to limited-access areas will be commercial grade, non-residential locks. Employees will only be given access to areas where they are authorized to work.

2.1.7 LIGHTING

The Project Site will have motion sensor lighting around the outdoor cultivation area and parking lot. Location of the lights is shown on the Security Site Plan in Appendix A. Outside lighting will utilize energy efficient lights and will only turn on for a short period of time (i.e. less than five minutes) if activated. Outside lighting will be shielded downward in a manner that is consistent with the County's requirements for outside lighting and glare.

Inside lighting inside the processing trailers and buildings will be used for normal business operations. Interior security lighting will be turned off during non-business hours and will only turn on if activated by the surveillance system. Security lighting inside cultivation areas is not proposed.

2.1.8 SIGNAGE

SLO Selects will post security signs stating "Authorized Personnel Only" on doors to areas requiring authorized access. SLO Selects will post security signs that the Project Site is being monitored by video surveillance.

2.1.9 FACILITY MAINTENANCE

SLO Selects will create procedures for facility maintenance inspections. Inspections will include visual inspection of fences, gates, doors, locks, lighting, and signs. SLO Selects will be responsible for making repairs and will use licensed professionals, as required. Maintenance inspections will be documented and kept as part of SLO Selects' record keeping process discussed below and in the associated Operations Plan.

2.2 ALARM SYSTEM

SLO Selects will have an alarm and surveillance system professionally installed, maintained, and monitored. The alarm system will include video surveillance, motion sensors, and door sensors, as necessary.

2.2.1 VIDEO SURVEILLANCE

Video surveillance cameras will be placed around the Project Site and within all limited access areas to monitor activities. See Appendix A – Security Site Plan for proposed locations of security cameras. Video surveillance cameras will have the following:

1. Cameras will be assigned a number for identification purpose following Sheriff approval of camera locations.
2. The video cameras will be able to effectively and clearly record images of the area under surveillance at all times.

SECURITY PLAN

3. Each camera will be permanently mounted and in a fixed location. Each camera shall be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises and allows for the clear and certain identification of any person and activities in all areas requiring authorized access.
4. The security surveillance cameras will be remotely accessible to regulatory agencies requiring access. Agencies requiring access will have remote real-time access. The surveillance system will software and hardware will meet regulatory agency requirements for compatibility.

Final location and numbering of security cameras may be subject to change. Any changes will be submitted to the appropriate agency with regulatory oversight.

2.2.2 VIDEO RECORDING PROTOCOL

Video recording will include the following:

1. Video will be recorded 24-hours a day on high-definition cameras at a minimum 15 frames per second, with a resolution of at 1280 X 720 pixels.
2. Recorded images shall clearly and accurately display the time and date. Time will be measured in accordance with the United States National Institute Standards and Technology standards.
3. The surveillance-system storage device or the cameras will be transmission control protocol (TCP) capable of being accessed through the internet.
4. Video surveillance recordings will be stored in a secure manner to protect from tampering or theft (e.g. tamper proof cabinet).
5. The video surveillance system will be equipped with a failure notification system that provides notification to the licensee and/ or alarm company of any interruption or failure of the video surveillance system or video surveillance-system storage device.
6. Video surveillance recordings will be kept for a period of at least 90 days.

2.2.3 ALARM AND SENSORS

SLO Selects will have an alarm system capable of notifying the police and other emergency services of a break in or emergency, such as a fire. The alarm system will include motion and door sensors capable of detecting unauthorized activity. It will also include smoke and fire detectors. Door sensors will also detect entry and exit into authorized areas.

2.2.4 BACKUP POWER

In the event of a power failure, SLO Selects will have battery backup power capable of providing power to the security system and keeping the Project Site secure. Backup power will be able operate video surveillance and storage, alarms and sensors, and ensure door locks are not released during a power failure.

2.2.5 SECURITY SYSTEM MAINTENANCE

SLO Selects will create inspection forms for facility maintenance inspections. Repairs to video surveillance or alarm systems will be completed by the professional alarm company responsible for maintenance and monitoring.

2.3 OPERATIONAL SECURITY MEASURES

2.3.1 EMPLOYEE ACCESS

Prior to employment, SLO Selects will interview all employees and require that employees submit to a background check and provide employment references. All employees must be at least 21 years of age.

SLO Selects' employees will wear identification badges. Badges will be laminated or plastic-coated and visible at all times while engaging in commercial cannabis activities. The identification badge will, at a minimum, include SLO Selects' name, license number, the employee's first name, an employee number exclusively assigned to that employee for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height. Employee identification badges will be revoked from employees no longer working at the Project Site.

SLO Selects employees will be assigned access cards and/or codes to enter and exit areas where they are authorized to work. Employees will be restricted from entry and exit of areas where they are not authorized to work as part of security protocols. Access cards and/or codes will be revoked from employees no longer working at the Project Site.

Only authorized employees will be issued keys to open storage cabinets or boxes required to complete their duties. For example, employees authorized to work in the cultivation area will be allowed access to fertilizers and equipment necessary for cultivation.

Employees will be required to sign in and out upon arriving and exiting the Project Site.

2.3.2 VISITOR ACCESS

SLO Selects will require that all contractors must be 21 years of age or older if working at the Project Site. SLO Selects will verify the age of all contractors.

SLO Selects will provide regulatory agencies with oversight and needing to enter the Project Site for inspections with the General Manager's contact information provided herein.

All contractors and agency personnel will be allowed access to the Project Site through the driveway entrance gate. Entry will be coordinated through the General Manager or their designated person. All visitors will be required to sign in and out upon entry and exit. All visitors coming to the Project Site will be assigned a visitor badge with a badge number corresponding to their name. SLO Selects will require that all visitors record their name, signature, company, and reason for the visit.

All contractors and agency visitors will be escorted through the facility at all times by authorized SLO Selects personnel. Visitors will only be able to access areas where they are authorized for the purposes of their work, inspection, or visit. Visitors will not remain onsite if they are not engaging in the activity expressly related to their approved work, inspection, or other approved visit relating to the operations of the Project Site. Visitors will not be provided access cards and/or codes at any time.

2.3.3 DELIVERIES AND TRANSPORTATION

2.3.3.1 *Non-Cannabis Product*

Deliveries of non-cannabis goods (e.g. fertilizers, office products, etc.) will occur during operational business hours. All non-cannabis products will be delivered to the parking lot. All deliveries will be coordinated with the General Manager or their authorized designee.

SECURITY PLAN

2.3.3.2 Cannabis Products

Deliveries and transportation of cannabis products to and from the Project Site will occur during normal business hours. Deliveries of cannabis products will only be conducted by a licensed distributor. Delivery vehicles of cannabis products will enter through the driveway gate and deliveries will be made in the parking area. Only authorized employees will be present when cannabis products are being delivered. All deliveries will be coordinated with the General Manager or their authorized designee.

Deliveries will be accompanied by a transportation manifest and will be tracked and traced according to state regulations.

2.3.4 EMERGENCY PROCEDURES

In the event of a life-threatening emergency, employees will be instructed to call 911 and, if necessary, move to a safe location. Additional measures include:

1. in general, only trained responders should provide first aid assistance;
2. do not move the victim unless the victim's location is unsafe;
3. control access to the scene;
4. take "universal precautions" to prevent contact with body fluids and exposure to bloodborne pathogens; and
5. meet the ambulance at the nearest entrance or emergency access point and direct them to victim(s).

If a medical emergency is reported, dial 9-1-1 and request an ambulance. Provide the following information:

1. number and location of victim(s);
2. nature of injury or illness;
3. hazards involved; and
4. nearest entrance (emergency access point).

In the event of a non-life-threatening emergency, such as suspicious activity, employees will be instructed to call the Sheriff at (805) 781-4540. The Project Site will have phone access in the event of an emergency.

Evacuation may be required if there is a fire in the building or other hazard. Employees will be warned to evacuate the building using the following system: fire alarm/sirens, strobe lights and verbal warnings. Employees will assemble in the parking lot for accounting in the event an evacuation is needed.

An act of violence in the workplace could occur without warning, such as a break in, attempted robbery, active shooter, or other acts of violence that are life-threatening while employees are working at the Project Site. SLO SELECTS employees will be trained on the locations to take safe refuge and actions to take if evacuation is necessary.

2.4 DELIVERY VEHICLE REQUIREMENTS

The following will be required for SLO Selects retail delivery vehicles:

1. As stated above, SLO Selects' delivery drivers will not leave cannabis products in an unattended motor vehicle unless the motor vehicle is locked and equipped with an active vehicle alarm system.

SECURITY PLAN

2. All vehicles used for the delivery of cannabis products will be outfitted with a dedicated Global Positioning System (GPS) device for identifying the geographic location of the delivery vehicle. A dedicated GPS device must be owned by SLO Selects and used for delivery only. The GPS device will be either permanently or temporarily affixed to the delivery vehicle and will remain active and inside of the delivery vehicle at all times during delivery. At all times, the SLO Selects will be able to identify the geographic location of all delivery vehicles that are making deliveries for SLO Selects and will provide that information to the BCC upon request.
3. Delivery vehicles will be outfitted with a mechanism to lock and secure cannabis products within a box, container, cage, or trunk of the vehicle.
4. Upon request, SLO Selects will provide the BCC with information regarding any motor vehicle used for the delivery of cannabis products, including the vehicle's make, model, color, Vehicle Identification Number, license plate number and Department of Motor Vehicles registration information.
5. Any motor vehicle used by SLO Selects to deliver cannabis products is subject to inspection by the BCC. Vehicles used to deliver cannabis products may be stopped and inspected by the BCC at any licensed premises or during delivery.

2.4.1 DELIVERY ROUTE

While making distribution and retail deliveries of cannabis products, SLO Selects' delivery driver will only travel from the facility to the delivery address; from one delivery address to another delivery address; or from a delivery address back to the facility. Delivery drivers will not deviate from the delivery path, except for necessary rest, fuel, or vehicle repair stops, or because road conditions make continued use of the route unsafe, impossible, or impracticable.

2.5 NOTIFICATION AND INCIDENT REPORTING

SLO Selects will notify the Sheriff and state agency responsible for regulatory oversight in the event of the following:

1. any theft, loss, or other criminal activity occurring at the Project Site;
2. significant discrepancies during inventory audits;
3. the loss or unauthorized alteration of records related to cannabis; and
4. any other breach of security.

All incidents regarding a breach in security will be recorded and records kept as part of SLO Selects' record keeping process.

3.0 TRAINING

The Employee Training Manager will ensure employees are trained on the security measures discussed herein prior to beginning employment. If there are any significant changes to this Security Plan, employees will be notified of such changes and notification will be documented. In addition, employees will go through an annual refresher course to review security and emergency procedures. Training records will be kept at the facility in hard copy and/or electronic versions and will be accessible to regulatory inspection upon request.

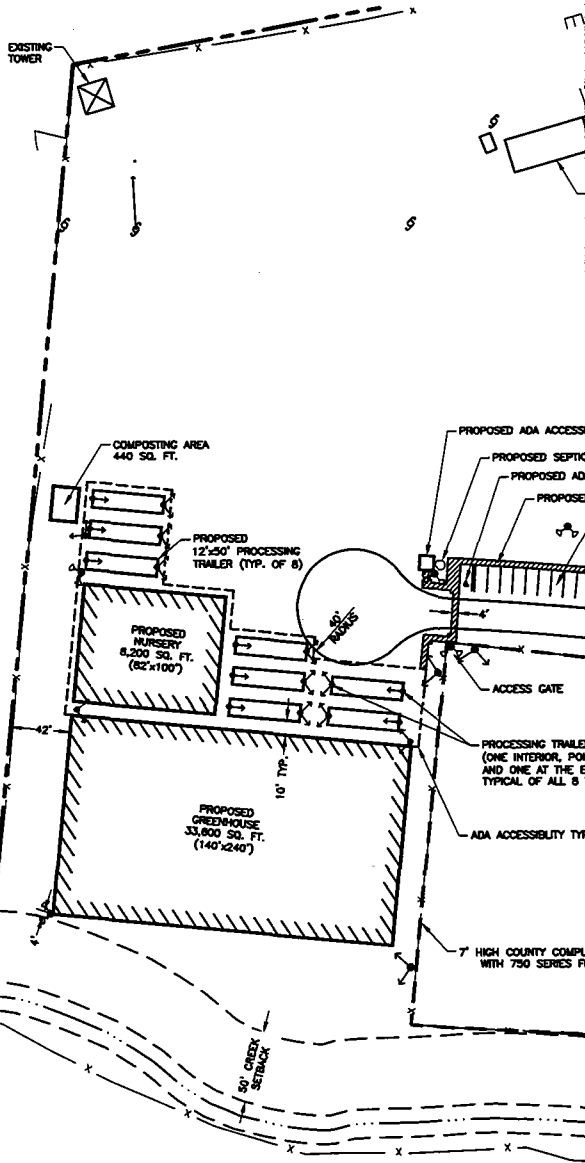
4.0 RECORD DKEEPING

The Record Keeping Manager or authorized designee will maintain the following records:

1. security inspections;
2. maintenance of physical security measures, video surveillance, and alarm systems;
3. notifications regarding a breach in security measures; and
4. employee training.

SLO Selects will keep all records for a minimum of seven years, or as required each regulatory agency with oversight. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

APPENDIX A – SECURITY SITE PLAN



NOTES

THE TRAILER FOR THE OFFICE / MOBILE DISPENSARY SHALL HAVE INTERIOR SECURITY CAMERAS THAT CAN VIEW THE ENTRIES AND EXITS FOR ALL ROOMS CONTAINING CANNABIS (INCLUDING THE FRONT DOOR). ANY ROOMS STORING CANNABIS SHALL ALSO HAVE INTERIOR CAMERAS MONITORING THE PRODUCT AT ALL TIMES.

THERE SHALL BE A SECURITY ROOM IN THE SAME TRAILER THAT HOUSES THE VIDEO FOOTAGE TO A HARD DRIVE THAT WILL BE STORED IN A LOCKED AND CAMERA-MONITORED LOCATION. FOOTAGE WILL BE STORED FOR A MINIMUM OF 90 DAYS AND THE CAMERA SYSTEM WILL HAVE A 48 HOUR BATTERY BACKUP.

DEVELOPMENT PLAN FOR

LOT 19

LOT 19 OF BRANCH TRACT,
PER THE MAP RECORDED IN BOOK 01 OF MAPS AT PAGE 32,
COUNTY OF SAN LUIS OBISPO, STATE OF CALIFORNIA.

ARROYO GRANDE, CALIFORNIA

PREPARED FOR:
Owners/Applicant

KOENIG
3919 HUASANA RD
ARROYO GRANDE, CA 93420
(831) 588-6214

PREPARED BY:
Engineer

GARING TAYLOR & ASSOCIATES
141 S. ELM STREET
ARROYO GRANDE, CA 93420
(805) 489-1321
JEFFREY J. EMRICK, P.E.

GTA NO.: 18-713
PLOT DATE: 4/4/19
FILE NAME: SITE PLAN.DWG

 **PROPOSED SECURITY**

 **GARING, TAYLOR & ASSOCIATES, INC.**
CIVIL ENGINEERS SURVEYORS PLANNERS
141 SOUTH ELM STREET · ARROYO GRANDE, CA 93420 · (805) 489-1321

ATTACHMENT C – WASTE MANAGEMENT PLAN

WASTE MANAGEMENT PLAN

Prepared by:

**SAN LUIS OBISPO SELECTS, INC.
3919 Huasna Road
Arroyo Grande, 93420**

WASTE MANAGEMENT PLAN

SLO Selects
Arroyo Grande, California

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1.0 INTRODUCTION

San Luis Obispo Selects, Inc. (SLO Selects) has prepared this Waste Management Plan for commercial cannabis activities located at 3919 Huasna Road, Arroyo Grande, California 93420 (Project Site). Commercial cannabis activities will include the following:

1. cannabis cultivation (outdoor and indoor);
2. cannabis nursery;
3. cannabis processing area as an ancillary use to cultivation;
4. non-volatile manufacturing activities; and
5. non-storefront delivery service.

This Waste Management Plan was developed to identify potential waste streams, waste disposal, and procedures for managing wastes produced at the Project Site. Waste disposal will comply with all applicable federal, state, and local regulations.

In the event of any significant changes to this Waste Management Plan, SLO Selects will notify and submit an updated version for review and approval to the San Luis Obispo County Planning and Building Department (County), California Department of Food and Agriculture (CDFA), Bureau of Cannabis Control (BCC), California Department of Public Health (CDPH), and any local and state agencies with regulatory oversight.

2.0 WASTE MANAGEMENT

2.1 WASTE CLASSIFICATION

Waste streams will be managed by the type of waste and agency requirements. Wastes types associated with the facility include:

1. cannabis waste,
2. solid waste,
3. liquid waste, and
4. hazardous waste and universal waste.

2.2 CANNABIS DERIVED WASTE

SLO Selects will cultivate cannabis plants on an ongoing basis, manufacture non-volatile cannabis products, and operate a non-storefront delivery service. These activities will produce cannabis waste. All cannabis waste will be managed in accordance County and state agency regulations.

2.2.1 Cultivation

SLO Selects will cultivate cannabis plants in both the vegetative and flowering on a continual basis. Plants will be harvested approximately every two to three weeks. Additionally, plants will be cultivated on a continual basis for nursery operations. During the growth process SLO Selects will trim and prune the plants to ensure maximum plant health. During harvest and nursery operations SLO Selects will dispose of stalks, stems, leaves, and parts of the cannabis plant that are considered waste.

Following harvest, the plants will be trimmed in the processing trailers. During this process there will be leaves and stems that are discarded. Cannabis leaves that can be used for pre-rolled joints will be stored for later use. Trichomes collected during the trim process will also be stored for later use.

Cannabis related waste associated with the activities described above include:

1. stalks and stems;
2. leaves and flowers;
3. post-process manufactured cannabis waste;
4. root balls and growing medium; and
5. any event resulting in exposure or compromise of cannabis products.

2.2.1.1 Cultivation Waste Disposal

Cannabis waste that includes stalks, stems, leaves, flowers, root balls, or any compromised cannabis material will be composted onsite in the designated compost area shown on the Site Plans in Attachment A of the associated Operations Plan. The compost area will only be accessible to authorized personnel.

All cannabis stalks, stems, leaves, flowers, or compromised cannabis material waste will be weighed prior to taking the waste to the composting area. Cannabis waste will be mixed with other organic materials, such as paper waste, non-cannabis green waste, cardboard waste, grease or other compostable oil waste, food waste, Bokashi or other compost activators, soil, or other compostable materials. Cannabis waste

will be tracked and traced in accordance with CDFA requirements. SLO Selects elects to integrate the composted material back into the soil. Growing medium will be not be disposed of and will be amended for reuse.

In the event SLO Selects chooses to use a licensed waste hauler for cannabis waste disposal, SLO Selects will coordinate with the licensed waste hauler for a special pickup. All cannabis waste requiring a special pickup will be stored in a locked bin within the respective cultivation area. In addition, SLO Selects will perform the following:

1. record the name of the entity hauling the waste;
2. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
3. track all cannabis waste in accordance with state track and trace requirements; and
4. keep records of cannabis waste disposal.

2.2.2 Manufacturing

SLO Selects will use harvested plant material (i.e. trim and flowers) for non-volatile manufacturing activities. Manufacturing activities will occur on a continual basis in conjunction with cannabis harvesting. Manufactured products can include production of kief by mechanical means, ice-water hash, and rosin. These activities do not include the use of solvents or chemicals.

Cannabis related waste associated with the activities described above include:

1. leaves and flowers;
2. post-process manufactured cannabis waste; and
3. any event resulting in exposure or compromise of cannabis products.

2.2.2.1 Manufacturing Waste Disposal

Manufactured cannabis waste will be disposed of in designated waste bins located inside the manufacturing building. Manufactured cannabis waste bins will be locked, under video surveillance, and only be accessible to authorized personnel. SLO Selects will dispose of cannabis waste in compliance with County and CDPH requirements.

SLO Selects will contract with a licensed waste hauler for pickup and removal of manufactured cannabis waste. SLO Selects will coordinate with the licensed waste hauler for pickup days and times.

Prior to manufactured cannabis waste disposal, it will be rendered unrecognizable and unusable by mixing the cannabis waste with 50 percent of non-cannabis waste by weight. The following non-cannabis mediums may be used in the mixture:

1. paper waste;
2. plastic waste;
3. cardboard waste;
4. food waste;
5. grease or other compostable oil waste;
6. Bokashi or other compost activators;
7. soil; and

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8. other state-approved medium that will render cannabis waste unusable and unrecognizable.

In addition, SLO Selects will perform the following:

5. record the name of the entity hauling the waste;
6. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
7. obtain a copy of the certified weight ticket, or other documentation prepared by the entity hauling the waste confirming receipt of the cannabis waste;
8. track all cannabis waste in accordance with state track and trace requirements; and
9. keep records of cannabis waste disposal.

In the event SLO Selects chooses to self-haul manufactured cannabis derived waste to a licensed disposal facility, SLO Selects will obtain a copy of a certified weight ticket or receipt from the solid waste facility documenting delivery of cannabis waste. Only authorized employees using state compliant vehicles will transport self-hauled cannabis waste.

2.2.3 Non-Storefront Delivery

SLO Selects will operate a non-storefront retail delivery service and sell products cultivated onsite. Delivery operations will occur on a continual basis. The delivery service will only handle cannabis products that have been packaged and labeled for retail sale. Minimal cannabis waste is anticipated with delivery operations.

Cannabis related waste associated with the activities described above include:

1. any event resulting in exposure or compromise of cannabis products; and
2. any event where the destruction of cannabis products is required by state or local regulatory agencies, such as cannabis product reaching its best-by, sell-by, or expiration date, if any.

2.2.3.1 Non-Storefront Cannabis Waste Disposal

In the event cannabis waste is generated from delivery service activities, it will be disposed of in a designated waste bin located inside the delivery service building. The waste bin, such as a 5-gallon bucket, will be air tight, locked, under video surveillance, and only be accessible to authorized personnel.

SLO Selects will contract with a licensed waste hauler for pickup and removal of cannabis waste from the delivery service. SLO Selects will coordinate with the licensed waste hauler for pickup days and times.

Prior to cannabis waste disposal, it will be rendered unrecognizable and unusable by mixing the cannabis waste with 50 percent of non-cannabis waste by weight. The following non-cannabis mediums may be used in the mixture:

1. paper waste;
2. plastic waste;
3. cardboard waste;
4. food waste;
5. grease or other compostable oil waste;
6. Bokashi or other compost activators;
7. soil; and

WASTE MANAGEMENT PLAN

8. other state-approved medium that will render cannabis waste unusable and unrecognizable.

In addition, SLO Selects will perform the following:

10. record the name of the entity hauling the waste;
11. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
12. obtain a copy of the certified weight ticket, or other documentation prepared by the entity hauling the waste confirming receipt of the cannabis waste;
13. track all cannabis waste in accordance with state track and trace requirements; and
14. keep records of cannabis waste disposal.

In the event SLO Selects chooses to self-haul cannabis derived waste to a licensed disposal facility, SLO Selects will obtain a copy of a certified weight ticket or receipt from the solid waste facility documenting delivery of cannabis waste. Only authorized employees using state compliant vehicles will transport self-hauled cannabis waste.

2.3 SOLID WASTE

Consistent with typical business operations, SLO Selects will generate solid waste consisting of normal refuse, such as paper products, discarded packaging, plastics, building materials, food, broken equipment, and recyclable materials. Solid waste does not include cannabis waste.

2.3.1 Solid Waste Disposal

Products that can't be recycled will be discarded in trash receptacles designated for solid waste. Solid waste bins will be located in the cultivation areas and in each building. Bins will be emptied on a weekly basis, or as needed, into commercial dumpsters provide by Waste Connections, a local licensed waste hauler. Solid waste will be picked up on a weekly basis by Waste Connections. SLO Selects will coordinate with Waste Connections for the day and time of solid waste pickup.

Products such as paper, cardboard, plastics, bottles etc. will be recycled to the maximum extent feasible. Recycling bins will be located in the cultivation areas and in each building. Bins will be emptied on a weekly basis, or as needed, into the recycling receptacles provide by Waste Connections. Recycling waste will be picked up on a weekly basis by Waste Connections. SLO Selects will coordinate with Waste Connections for the day and time of recycling pickup.

2.4 LIQUID WASTE

Liquid waste associated with the facility operations will include domestic waste and irrigation discharge. SLO Selects proposes to minimize liquid waste by implementing the following:

1. install water fixtures that minimize water consumption, such as low-flow toilets and sink aerators;
2. irrigate cannabis plants using drip irrigation; and
3. follow manufacturer specifications for cleaning of equipment.

2.4.1 Domestic Liquid Waste

The Project Site will have a septic system. Domestic waste resulting from normal restroom use will be discharged into the septic system. SLO Selects will not dispose of fertilizers, pesticides, or irrigation runoff into the septic system.

SLO Selects will clean the facility as necessary. Equipment will be cleaned according to the manufacturer's recommendations, or as necessary. SLO Selects will use cleaning products such as bleach bio-degradable cleaners and other cleaning products that are permitted by federal, state, and local agencies. Any domestic waste discharge to the septic system associated with cleaning activities will be minimized to the maximum amount feasible.

2.4.2 Irrigation Discharge

SLO Selects will not discharge any hazardous chemicals or hazardous effluent. SLO Selects will contact the Central Coast Regional Water Quality Control Board and apply for the required waste water discharge permits for cannabis cultivation

2.5 HAZARDOUS AND UNIVERSAL WASTE

Universal waste is common waste that is considered hazardous but can be disposed at a licensed disposal facility. Universal wastes can include, but are not limited to, the following:

1. batteries,
2. compact fluorescent light bulbs;
3. nutrient fertilizers;
4. cleaning agents;
5. expired pesticides;
6. ink cartridges; and
7. electronic waste, such as computer monitors.

2.5.1 Hazardous and Universal Waste Disposal

SLO Selects will store pesticides and fertilizers in secure storage containers. Cabinets will only be accessible to authorized personnel. Fertilizer or pesticide containers that have reached their expiration date or can no longer be used will be disposed of at a licensed disposal facility in compliance with federal and state regulations. SLO Selects will coordinate with Waste Connections for pickup of hazardous waste or will self-haul hazardous waste to a licensed disposal facility.

Other universal wastes that are not fertilizers or pesticides will be separated in bins by type of waste to ensure incompatible wastes are not put together. SLO Selects will coordinate with Waste Connections for pickup of universal waste or will self-haul the waste to a licensed disposal facility. Universal waste will be disposed of in compliance with federal and state regulations.

3.0 TRAINING

SLO Selects will develop training and procedures to manage wastes appropriately, which can include, but is not limited to, the following:

1. designate authorized personnel to manage and track cannabis waste in compliance with state requirements discussed in Attachment F – Inventory Management Plan of the associated Operations Plan;
2. develop procedures and train employees on the storage and handling of pesticides, fertilizers, and waste products; and
3. train employees on fertigation procedures and water conservation practices.

All employees will be required to go through waste training during the hiring process and on an annual basis. Documentation of waste training will be kept as part of SLO Selects' record keeping procedures.

4.0 RECORD KEEPING

SLO Selects will maintain the following records:

1. weight of cannabis waste;
2. records relating to destruction of cannabis goods;
3. pesticide application records;
4. any other required waste disposal records pertaining to universal or hazardous waste disposal;
and
5. employee training records.

Records will be kept for a period of seven years, or as required by the County and agencies with regulatory oversight. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

ATTACHMENT D – ODOR MANAGEMENT PLAN

ODOR MANAGEMENT PLAN

Prepared by:

SAN LUIS OBISPO SELECTS, INC.

3919 Huasna Road

Arroyo Grande, CA 93420

ODOR MANAGEMENT PLAN

SLO Selects
Arroyo Grande, California

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ODOR MANAGEMENT PLAN

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Arroyo Grande, California

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1.0 INTRODUCTION

San Luis Obispo Selects, Inc. (SLO Selects) has prepared this Odor Management Plan for commercial cannabis activities located at 3919 Huasna Road, Arroyo Grande, California 93420 (Project Site). Commercial cannabis activities will include the following:

1. 3-acre canopy of outdoor cannabis cultivation;
2. 33,600 square foot (SF) greenhouse to cultivate a 22,000 SF mixed-light/ indoor canopy;
3. 8,200 SF greenhouse for a cannabis nursery;
4. 4,800 SF of cannabis processing area as an ancillary use to cultivation;
5. 960 SF area for non-volatile manufacturing activities; and
6. 960 SF area for a non-storefront delivery service.

The purpose of this Odor Management Plan is to identify potential cannabis related odor sources and mitigate the potential for odor detection outside of designated areas to the maximum extent feasible.

1.1 FACILITY CONTACT INFORMATION

In the event there is a complaint about odors, please contact SLO Selects' General Manager at the following:

San Luis Obispo Selects
Krista Koenig – Owner/ General Manager
3919 Huasna Road
Arroyo Grande, CA 93420
(831) 588-6214

2.0 ODOR EMISSIONS

SLO Selects has identified potential odor sources, the potential timing of odors, and mitigation measures to ensure odors are not detected outside of designated areas.

2.1 ODOR SOURCES

SLO Selects will cultivate outdoor and indoor cannabis, manufacture cannabis cultivated onsite, and deliver cannabis cultivated onsite. As such, there is the potential to detect odors in and around the Project Site. For the purposes of this Odor Management Plan, nursery activities are not included in the odor emissions discussion because immature cannabis plants do not emit a pungent odor typically associated with cannabis. Sources of odors are discussed below.

2.1.1 CANNABIS CULTIVATION AREAS

Odors from cannabis cultivation are the result of the plants in the flowering phase. Most cannabis plants flower for approximately six to nine weeks depending on the variety. Odors are typically present the last three to four weeks of the flowering period prior to harvest. Plants in the vegetative phase and early flowering phase do not exhibit an odor usually associated with cannabis.

2.1.2 PROCESSING AREAS

Processing includes harvesting, drying, curing, packaging, and storage. Cannabis plants are harvested once they reach their final maturation point, which is typically six to nine weeks after beginning the flowering phase. Harvested cannabis is then hung up on lines or racks inside a building to dry. Drying plants have the potential to create odors due to the ripening of the flowers.

Once dried, cannabis plants are ready to be trimmed. During the trimming process the cannabis is exposed to the environment and odors are typically present. Once plants are trimmed, and if the cannabis is not completely dry, it can be put into storage totes, bags, containers etc. to allow for the flowers to cure. During the curing process the container is opened and closed to allow for moisture to escape as the flowers ripen. During this process there is the potential to emit odors when the containers are opened.

2.1.3 PACKAGING

The trimmed and cured cannabis can be packaged prior to transport to a distributor. Packaging has the potential to emit odors because the cannabis is exposed to the environment.

2.1.4 CANNABIS MANUFACTURING AREAS

Manufacturing has the potential to emit odors because the raw cannabis material is exposed to the environment during the manufacturing process. The final manufactured product also has the potential to emit odors.

2.1.5 DELIVERY AREAS

Delivery of cannabis products to the facility will be performed by license distributors. Retail cannabis products are put into air-tight packaging and so there is little potential for odor.

ODOR MANAGEMENT PLAN

2.2 TIMING OF ODOR SOURCES

Timing of odor sources is dependent on the timing of the activity as discussed below.

2.2.1 CANNABIS CULTIVATION

SLO Selects will cultivate outdoor and indoor cannabis. For outdoor, the cultivation period typically starts in June and ends in November. During the months of June through August the cannabis plants are in the vegetative phase and do not exhibit odors associated with cannabis. The plants begin to flower in September and finish their cycle in late October or early November. During the last three to four weeks of flowering the plants produce an odor. The timing of this would be during October and early November as some plants take longer to mature and finish their flowering cycle. Once the plants have reached maturity they will be harvested. Once all the plants have been harvested there is no longer the potential of odors from outdoor cannabis cultivation.

Indoor cultivation activities will occur on a year-round basis as so the potential for odors is continuous.

2.2.2 HARVESTING AND DRYING

Harvesting for outdoor cultivation will occur in phases as plants reach maturity. Some plants will reach maturity as soon as seven weeks after flower initiation, while other plants will take nine weeks and sometimes longer. It is estimated that harvesting the outdoor cannabis will take up to a month starting in late October.

Harvesting for indoor cultivation will occur on a continual basis approximately every two to three weeks.

Drying of cannabis takes approximately two weeks depending on ambient air conditions such as temperature and humidity. Drying the outdoor cannabis will take approximately one month. Drying of the indoor cannabis will occur on a regular basis because plants will be harvested on a continual basis.

2.2.3 TRIMMING AND CURING

Cannabis plants are trimmed once dried. Trimming will take place in the drying/ processing trailers. The amount of time it takes to trim is dependent on the amount of cannabis harvested and output production of trimmers. Typically, trimming of the outdoor cannabis will take one to two months. Trimming the indoor cannabis will take approximately two weeks. Plants that are dried but are not ready to be trimmed will be broken down and stored in totes or containers until ready for trimming.

Cannabis that has not fully dried or cured will be left in totes and the totes will be opened and closed to allow for the flowers to cure. The curing process typically takes about a week.

2.2.4 PACKAGING

Once trimmed and cured the cannabis flowers will be packaged in either bulk containers or individual packaging for transport to a distributor. Packaging of products will be concurrent with the trimming and curing process.

2.2.5 MANUFACTURING AND DELIVERY

Manufacturing and delivery activities will occur on a continual basis.

3.0 ODOR MITIGATION

As stated above, there are potential cannabis related odors from cultivation, processing, manufacturing, and delivery activities. SLO Selects will use engineering and administrative control to mitigate odors to the maximum extent feasible, as discussed below.

3.1 ENGINEERING CONTROLS

SLO Selects will use best control technology to ensure odors are not detectable outside the Project Site boundaries.

3.1.1 GREENHOUSE AND BUILDINGS

To achieve odor control in the mixed-light indoor greenhouse and processing, manufacturing, and delivery service trailers, doors will be used to separate areas where odors have the potential to be emitted. Access to these areas will be for authorized personnel only and entry will require the use of a keycard or access code for entry. Doors will remain closed at all times when not in use.

In addition to physical separation, fans and carbon air filters will be used in rooms with the potential to emit odors. Carbon filters use activated carbon to neutralize odors as air passes through the filter. A fan is used to push or pull air through the filter and this process will “scrub” and recirculate the air in the room. Filtered air can also be directed to the outside area through ducting, as needed.

The number of carbon filters will be determined by the size of the room (in cubic feet) and air flow within each room. A Professional Engineer will prepare final plans with air filter locations, equipment specifications, and air flow calculations during the building permit process. An example specifications sheet for a carbon filter and fan is shown in Appendix A – Example Specifications.

3.1.2 OUTDOOR CULTIVATION AREA

To help achieve odor control in the outdoor cultivation area, SLO Selects has located the cultivation site in an area that is setback more than 300 feet from the front, sides, and rear property lines. At this location the prevailing winds predominantly move from west to east during the summer months, and from north to south during the fall and winter months. Properties to the south and east are currently used for crop production.

SLO Selects proposes to plant cannabis strains that have different flowering periods. This will decrease the number of flowering plants reaching maturity at one time, and thereby will decrease the number of plants producing odors.

3.2 ADMINISTRATIVE CONTROLS

In addition to engineering controls, SLO Selects will implement the following administrative controls:

1. Ensure doors remain closed at all times except for entry and exit by authorized personnel.
2. Ensuring that authorized personnel work in their designated areas.
3. Establish procedures to inspect doors and odor control equipment (e.g. carbon air filters) and maintain and/or replace equipment according to the manufacturer’s recommendations, or as needed.
4. Establish procedures to manage odor complaints and train employees on odor mitigation.

ODOR MANAGEMENT PLAN

3.2.1 MANAGING ODOR COMPLAINTS

SLO Selects will perform the following to manage potential odor complaints:

1. SLO Selects will provide the General Manager's contact information to the County for any odor related complaints. At the County's request, the contact information of the General Manager will also be provided to neighboring businesses and residences in the event of an odor complaint.
2. SLO Selects will have the General Manager or authorized designee onsite during operational hours to ensure odor complaints can be answered and managed accordingly.
3. All odor complaints will be addressed within 24 hours of receiving the complaint.
4. The General Manager or authorized designee will identify the location of where the odor is causing a nuisance.
5. For buildings, the General Manager or authorized designee will inspect all doors and areas where there is potential for odor-emitting activities and will ensure these areas are properly isolated. If it is found that isolation is not performed correctly, the General Manager will investigate the reason and do one of the following:
 - a. Talk with staff about the need to keep doors closed for odor-emitting areas. If necessary, retrain staff on administrative odor controls discussed herein.
 - b. Contact a licensed contractor to fix broken doors or seals.
6. The General Manager or authorized designee will also inspect engineering controls to ensure they are functioning properly. This will include, but is not limited to, the following:
 - a. ensure equipment is turned on and working properly;
 - b. inspect equipment to ensure fans, filters, and ducting are attached correctly;
 - c. inspect equipment maintenance logs to ensure filters have been replaced as required by manufacturer;
 - d. replace broken fans or ducting that have been damaged.
7. All odor complaints will be documented, including:
 - a. the person making the complaint;
 - b. where the complaint occurred;
 - c. the date and time of the complaint;
 - d. the person that received the complaint;
 - e. the date and time the complaint was investigated;
 - f. engineering controls that were inspected and administrative controls that were assessed;
 - g. identification of engineering and/ or administrative controls that were identified as the cause of the odor;
 - h. actions taken to correct the problem, including the work performed, equipment needed, and any additional training; and
 - i. recommendations and actions taken to ensure the problem does not continue.

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3.2.2 CONTINGENCY ODOR MANAGEMENT

In the event that odor nuisances continue after implementing the administrative and engineering controls discussed herein, SLO Selects will perform one or more of the following:

- 1) minimize operations that create odors;
- 2) purchase additional filters and fans as backup in the event the equipment breaks, or replacement is necessary;
- 3) add additional charcoal filters and fans or upgrade to a larger size filter and fan that can “scrub” more air in areas with odor-emitting activities; or
- 4) contract with a professional odor management specialist, such as Byer Scientific and Manufacturing, to assess and determine what additional measures and equipment can be added to ensure adequate odor mitigation is achieved.

Each one of the above-mentioned steps will be assessed and monitored to determine if the modifications are effective in mitigating odors. SLO Selects will notify the County of any changes to equipment and procedures used to mitigate odors. Any changes will be added to SLO Selects’ inspection procedures and training processes.

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4.0 TRAINING

Staff will be trained on procedures for mitigating odor, as discussed above. The General Manager or their designee will be responsible for training all new employees prior to beginning work in areas where there is potential for odor-emitting activities. Staff will be required to go through training on an annual basis to review odor mitigation procedures. SLO Selects will keep records of training as part of its record keeping procedures discussed below.

5.0 RECORD KEEPING.

Records pertaining to this Odor Management Plan will include, but are not limited to, the following:

1. performed maintenance logs for mechanical and odor control equipment;
2. records of purchases for maintenance equipment (e.g. carbon filter replacement);
3. documentation and notification of equipment malfunctions;
4. documentation of odor complaints;
5. employee training logs; and
6. documentation for review and changes to engineering and administrative controls discussed in this Odor Management Plan.

Records will be kept for a period of seven years, or as required by the County and agencies with regulatory oversight. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

APPENDIX A – EXAMPLE SPECIFICATIONS

CARBON AIR FILTER AND FAN

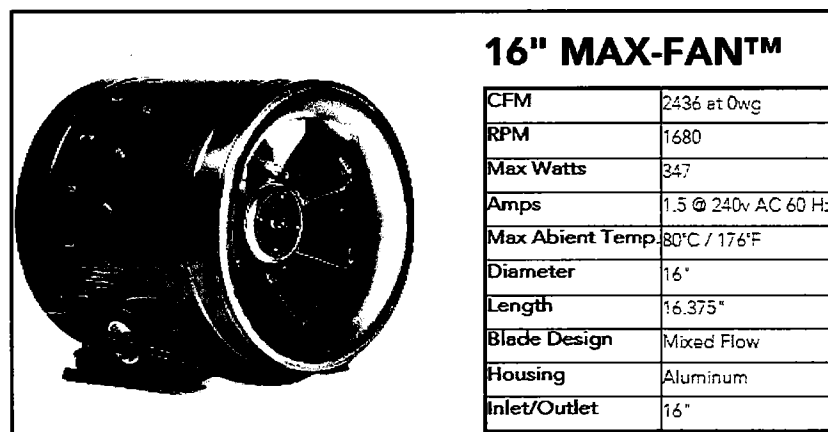


Figure 1. The above depiction is an example of the type of fan that is used to push or pull air through a carbon air filter as shown in Figure 2 below.

(Can-Filters®. 2018. http://canfilters.com/?geoip_country=US)

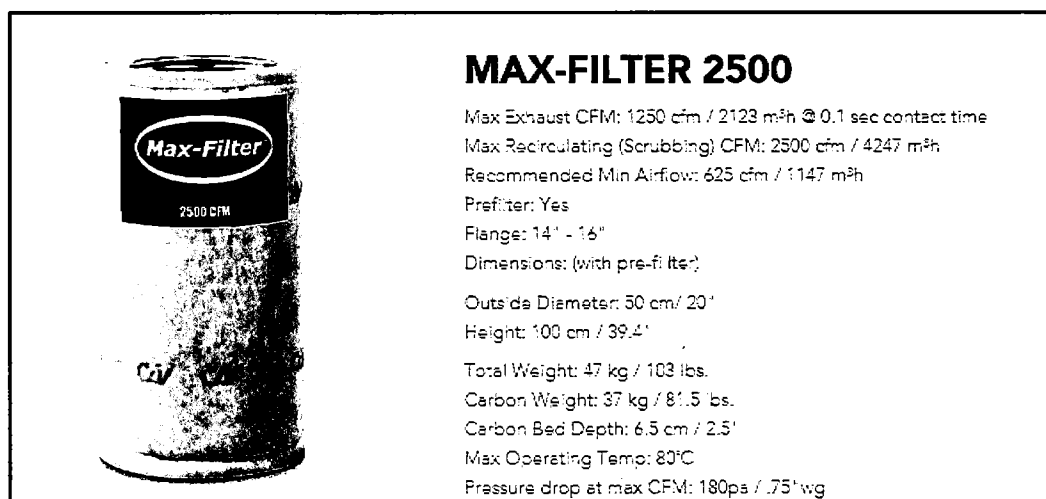


Figure 2. The above depiction is an example of a carbon filter that, when used in conjunction with a fan as shown in Figure 1 above, neutralizes odors.

(Can-Filters®. 2018. http://canfilters.com/?geoip_country=US)

ATTACHMENT E – CULTIVATION PLAN

CULTIVATION PLAN

Prepared by:

**SAN LUIS OBISPO SELECTS, INC.
3919 Huasna Road
Arroyo Grande, CA 93420**

CULTIVATION PLAN

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1.0 INTRODUCTION

San Luis Obispo Selects (SLO Selects) has prepared this Cultivation Plan for cannabis cultivation activities located at 3919 Huasna Road, Arroyo Grande, California. (Project Site). This Cultivation Plan addresses cultivation equipment, operations, water and electricity use, waste management, and pesticide management and storage and disposal. Commercial cannabis activities will be implemented in two phases as discussed in the associated Operations Plan. Phase I cultivation activities will include the following:

1. 3-acre canopy of outdoor cannabis cultivation; and
2. 4,800 square feet (SF) of cannabis processing area as an ancillary use to cultivation;

Phase II cultivation activities will include the following:

3. 33,600 SF greenhouse to cultivate a 22,000 SF mixed-light/ indoor canopy; and
4. 8,200 SF greenhouse for a cannabis nursery.

SLO Selects is committed to designing a cultivation process that uses best-available control technology, is environmentally friendly, and produces the highest quality cannabis possible. The primary purpose of this Cultivation Plan is to demonstrate how SLO Selects will comply with the applicable laws and regulations pertaining to the proposed cultivation facility.

2.0 EQUIPMENT

SLO Selects will use equipment that meets federal and state regulatory standards, industry best practices, and best control technology.

2.1 LIGHTING SYSTEMS

Natural sunlight will be used for all cultivation activities. In addition, SLO Selects will utilize a combination of high intensity discharge (HID) bulbs, fluorescent lights, and the light emitting-diode (LED) lighting fixtures in the greenhouses. LED fixtures will be used in the mixed-light indoor greenhouse as supplemental lighting to natural sunlight. HID lights will be used for mother plants in the nursery greenhouse and fluorescent bulbs will be used for clones in the nursery greenhouse. Supplemental lighting will be used on days when additional light is needed to keep plants in the vegetative stage, or when sunlight is minimal due to clouds. Lights will not be used for outdoor cultivation.

2.2 FERTIGATION AND GROW MEDIA

Fertigation equipment will be installed and operated in accordance with the manufacturer's guidelines and comply with federal, state, and local agency regulations. Fertigation equipment will include, but is not limited to, the following:

1. water storage tanks;
2. drip irrigation tubing;
3. fertilizers; and
4. sensors, gauges, pumps, and other ancillary equipment necessary to measure fertilizers and maintain pressure and flow for irrigation lines.

Plants will either be cultivated in natural soil (outdoor cultivation), potting soil (greenhouses), or soilless growing media such as rockwool or peat cubes (clones).

3.0 CULTIVATION OPERATIONS

3.1 OUTDOOR CULTIVATION AREA

As part of Phase I implementation, SLO Selects will cultivate 3-acres of outdoor cannabis. The outdoor cultivation area will be surrounded by fencing and screening material. Plants will be placed in rows with enough aisle space to allow personnel access to the plants. A combination of potting soil and natural soil will be used for the grow media. SLO Selects will utilize raised mounds of potting soil that directly overlay the ground. Pots are not proposed for the outdoor cultivation area. Plants will be watered using drip irrigation.

3.2 MIXED-LIGHT / INDOOR CULTIVATION AREA

As part of Phase II implementation, SLO Selects will construct a 33,600 SF greenhouse for mixed-light indoor cultivation. The total canopy space of the greenhouse will occupy an area of 22,000 SF. To minimize disturbance on prime soils, the greenhouse will not have a concrete floor. The interior ground portion of the greenhouse will be covered with landscaping fabric and bark, mulch, or similar material to minimize impacts to the existing soil. SLO Selects will utilize raised beds filled with potting soil as the grow media.

SLO Selects will utilize natural sunlight to the maximum extent feasible for the indoor greenhouse; however, additional supplemental lighting will be needed on days when there is not enough light for vegetative growth and optimal flower production. Supplemental lighting in the indoor greenhouse will utilize 1,000-watt LED lights installed above the canopy areas. If supplemental lighting is required at night, blackout tarps will be used to cover the greenhouse to ensure that lighting is not visible from outside the greenhouse. Lights will only be used for approximately four hours a day for approximately two weeks.

Mixed-light indoor cultivation will occur year-round. SLO Selects proposes to stagger planting in the greenhouse to minimize the number of plants being harvested at one time. Harvesting and replanting will occur two to three weeks.

3.3 NURSERY

As part of Phase II implementation, SLO Selects will construct an 8,200 SF greenhouse to be used for retail nursery operations. To minimize disturbance to prime soils, the greenhouse will not have a concrete floor. The interior ground portion of the greenhouse will be covered with landscaping fabric and bark, mulch, or similar material to minimize impacts to the soil.

The greenhouse will be used to cultivate plants in the vegetative phase and will include mother plants, clones, teens, and a research and development area used to create or test new cannabis genetics. Mother plants are plants used to create clone stock. Teens are plants that are taller and more developed than clones. Mothers and teens will be grown in pots with filled with potting soil. Clones will be propagated in a soilless growing media, such as rockwool or cubes made of peat, coco or other inert material. SLO Selects proposes to use greenhouse tables for teens and a tiered racking system for clones.

SLO Selects will use natural sunlight to the maximum extent feasible for nursery operations; however, additional supplemental lighting will be needed to keep plants in the vegetative state and to allow for maximum plant health. Supplemental lighting in the nursery greenhouse will utilize 1,000-watt HID bulbs installed above the mother and teen plants. These lights will be used for approximately four to six hours

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per day, as needed. In addition, LED or fluorescent lights will be used for clones. Clones will be placed on racks and the fluorescent or LED lights will be attached to the racks above the clones. Fluorescent lights will be used up to 18 hours a day.

If supplemental lighting is required at night, blackout tarps will be used to cover the greenhouse to ensure that lighting is not visible from outside the greenhouse. Nursery operations will occur year-round.

3.4 VEGETATIVE GROWTH

Outdoor cultivation activities will occur from mid to late June through early November, approximately. This period represents the typical outdoor growing season. During the months of June through August plants are in their vegetative growth period.

Plants in the greenhouse will receive 18-24 hours of light and 0-6 hours of darkness until they are ready to be flowered.

3.5 FLOWERING PHASE

Outdoor plants begin to flower in September when there is about 12-13 hours of light and 11-12 hours of darkness. The flowering phase typically lasts until the end of October or early November depending on the strain. SLO Selects will cultivate strains with different flowering cycles to minimize the number of plants being harvested. Flower maturity takes approximately six to nine weeks depending on the strain.

Plants in the greenhouse will receive 12 hours of light and 12 hours of darkness to induce flowering. Plants are in the flowering phase for approximately six to nine weeks depending on the strain of cannabis.

3.6 TOPPING

Topping involves locating the top of the plant and cutting the main stem just below the newest growth, making it a "headless" plant. The new branch will then form a "Y" shape, allowing for two new stems to grow. Whenever you cut one stem, the smaller leaves below the cut area begin to grow out new branches. If you cut one stem, it will turn it into two stems; cut those two stems, they will turn into four, and so on. Additionally, topping the plant sends hormones throughout the plant that signals the plant to branch out and grow more tops, which increases a plant's yield capacity.

The plant matter produced from topping will be disposed of in accordance with the Waste Management Plan.

3.7 PRUNING

Pruning is a process that is required on a regular basis to maintain healthy plants. The lower region of the plant will be pruned of all leaves and smaller branches, which in turn promotes upward growth. This allows the plant to utilize its resources and energy toward growing its upper portion, or the area that is more likely to produce healthy clones.

The pruned plant matter will be disposed of in accordance with the Waste Management Plan.

3.8 FERTIGATION

Fertigation activities include the mixing of water and fertilizers and delivering the mixture to the plants. This mix is then distributed to cultivated plants using pumps, irrigation lines, and drip nozzles. This process allows for precise control over the amount of nutrients and water used to irrigate plants and minimizes waste water.

3.9 EQUIPMENT CLEANING AND MAINTENANCE

SLO Selects will need to clean equipment and cultivation areas in order to maintain a clean, healthy, and contaminant-free environment. Cleaning agents can include, but are not limited to, biodegradable soaps, citric acid, hydrogen peroxide, or other chemicals approved by federal and state regulations.

All equipment used will be cleaned and maintained in compliance with the manufacturer's recommendations, or as needed. Employees responsible for inspecting and cleaning equipment will be trained prior to working.

SLO Selects will maintain facility and equipment maintenance logs. SLO Selects will contract with qualified persons for maintenance requiring a licensed professional. Inspection records will be kept as part of the SLO Selects' record keeping process discussed herein.

3.10 FERTILIZER STORAGE

Fertilizers will be stored in their original containers within locked cabinets. This will provide secondary containment and minimize the potential for spills and accidental exposure. Fertilizer will be properly labeled and stored in compliance with the manufacturer's guidelines. Only authorized personnel have access to fertilizers.

4.0 PESTICIDE MANAGEMENT

SLO Selects will not use pesticides, insecticides, herbicides, fungicides, and rodenticides (collectively referred to as “pesticides”) prohibited by federal, state, or local agency regulations, or in a manner that is inconsistent with the manufacturer’s recommendations.

Pesticides will be applied to control pests and plant disease, as necessary. SLO Selects will use pesticides with ingredients that are approved by the California Department of Food and Agriculture (CDFA) as being exempt from residual tolerance requirements, and either exempt from registration requirements or registered for a use that’s broad enough to include use on cannabis.

4.1 ROLES, RESPONSIBILITIES, AND TRAINING

The following will be performed for employees responsible for pesticide application:

1. SLO Selects will designate employees to apply pesticides in accordance with the manufacturer’s labeling.
2. SLO Selects will ensure that designated employees are trained on the handling, use, and application rate of all pesticides used for cultivation at the Project Site.
3. SLO Selects will supply personal protective equipment (PPE) and ensure that designated employees follow PPE requirements as determined by the manufacturer’s PPE requirements.
4. Employees will be trained on proper PPE use as required by the manufacturer.
5. Employees will be trained on safety and documentation procedures for pesticide application.
6. Training and pesticide application records will be kept as part of the SLO Selects’ record keeping process.

4.2 INTEGRATED PEST MANAGEMENT

4.2.1 CULTURAL PEST-MANAGEMENT CONTROL METHODS

SLO Selects will develop procedures to ensure employees use proper PPE and maintain good hygiene while working in cultivation areas. Cultivation areas will be kept free of debris to minimize exposure to pests, bacteria, and fungus.

4.2.2 BIOLOGICAL PEST-MANAGEMENT CONTROL METHODS

SLO Selects will use biological controls, such as predatory insects as part of its IPM. Examples of predatory insects include predatory nematodes, predatory aphids, predatory mites, lacewigs, or ladybugs. SLO Selects will also use beneficial bacteria and fungus that aid plant health and help control harmful plant disease and pests.

4.2.3 CHEMICAL PEST-MANAGEMENT CONTROL METHODS

SLO Selects will use chemical pest control methods as part of its IPM. All proposed chemical ingredients are listed by the CDFA as allowed for use on cannabis. Chemical pesticides will be applied either through nozzle sprayers, foggers, drip irrigation (i.e. chemigation), or other application means in accordance with the manufacturer’s guidelines. Chemical products and their active ingredients can be found on the following page in Table 1 – Chemical Pest Controls.

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Table 1. Chemical Pest Controls

Manufacturer	Common Name	Active Ingredient
Marrone Bio Innovations	Regalia	Extract of Reynoutria Sachalinensis
General Hydroponics	Azamax	Azadachtrin
Lost Coast	Plant Therapy	Soybean Oil, Peppermint Oil, and Citric Acid
Bayer	Serenade	QT 713 strain of Bacillus Subtilis
Valent	Pyganic EC 5.0	Pyrethrins
Marrone Bio Innovations	Grandevo	Chromobacterium Subtsugae PRAA4-1
Marrone Bio Innovations	Venerate	Burkholderia spp. strain A396
Bionide	Sulphur/ wettable Sulfur	Sulfur
Pathogen Zero	Pathogen Zero	Citric Acid
Amazing Dr. Zymes	Dr. Zymes Eliminator	Citric Acid
Bioworks	Botanigard 22WP	Beuveria Bassiana
Blacksmith Science	Armory	Beneficial Bacillus Blend
Monterey	Monterey B.T.	Bacillus Thuringiensis
BioSafe Systems	Zerotol 2.0	Hydrogen Dioxide, Peroxyacetic Acid
Wondercide	Outdoor Pest Control	90 % Cedar Oil
Food Grade	Food Grade Hydrogen Peroxide 32%	Hydrogen peroxide
Greenspire Global Inc.	Proacidic 2	Citric Acid

SLO Selects will submit any changes to this list of pesticides in writing to the CDFA and local agencies for review and approval.

4.3 PESTICIDE STORAGE

Pesticides will be stored in their original containers within a designated storage container. This will minimize the potential for spills and accidental exposure. Pesticide containers will be properly labeled. The storage of pesticides will follow their manufacturer's guidelines. Only authorized personnel will have access to the cabinets containing pesticides.

Pesticides, emptied containers or parts thereof, or equipment that holds or has held a pesticide, will not be stored, handled, emptied, disposed of, or left unattended in such a manner that it presents a hazard to persons, animals, food, crops or property.

4.4 PESTICIDE SIGNAGE

SLO Selects will post visible signs around all areas where pesticides are stored. Signs will be of such size that it is readable at a distance of 25 feet and will state the following:

"DANGER"
"POISON STORAGE AREA"
"ALL UNAUTHORIZED PERSONS KEEP OUT"
"KEEP DOOR LOCKED WHEN NOT IN USE"

The notice shall be repeated in an appropriate language other than English when it may reasonably be anticipated that persons who do not understand the English language will come to the enclosure.

4.5 PESTICIDE SPILLS

As stated previously, and pesticides will be stored in secure containers that restrict access to unauthorized personnel and provide secondary containment in the event of container leaks. In addition, SLO Selects will do the following to mitigate the potential for spills and minimize environmental exposure:

1. Develop procedures for the handling, storage, and inspection of pesticides.
2. Develop procedures for PPE, spill response, and spill reporting and record keeping.
3. Provide spill response equipment, such as spill kits and emergency wash and eyewash stations.
4. Keep updated Safety Data Sheets (SDS) for pesticides and chemicals stored on-site.
5. Provide emergency contact information in the event of a spill that threatens the environment or life safety.

5.0 WASTE MANAGEMENT

Cannabis related waste associated with the activities described above include:

1. stalks,
2. leaves,
3. stems,
4. flowers; and
5. root balls and growing medium.

5.1 CANNABIS WASTE DISPOSAL

SLO Selects proposes to compost cannabis waste to the maximum extent feasible. SLO Selects will have an onsite composting area. Only authorized employees will have access to the composting area.

All cannabis stalks, stems, leaves, flowers, or compromised cannabis material waste will be weighed prior to taking the waste to the composting area. Cannabis waste will be mixed with other organic materials, such as paper waste, non-cannabis green waste, cardboard waste, grease or other compostable oil waste, food waste, Bokashi or other compost activators, soil, or other compostable materials. Cannabis waste will be tracked and traced in accordance with CDFA requirements. SLO Selects elects to integrate the composted material back into the soil. Growing medium will be not be disposed of and will be amended for reuse.

In the event SLO Selects chooses to use a licensed waste hauler for cannabis waste disposal, SLO Selects will coordinate with the licensed waste hauler for a special pickup. All cannabis waste requiring a special pickup will be stored in a locked bin within the respective cultivation area. In addition, SLO Selects will perform the following:

1. record the name of the entity hauling the waste;
2. obtain documentation from the entity hauling the waste that indicates the date and time of each collection of cannabis waste at the licensed premises;
3. track all cannabis waste in accordance with state track and trace requirements; and
4. keep records of cannabis waste disposal.

Waste management for the Project Site is discussed further in Attachment C of the associated Operations Plan.

6.0 TRAINING

SLO Selects employees will be trained on the following:

1. Proper use of fertigation equipment.
2. Handling, storage, and application of pesticides and fertilizers. Employees responsible for pesticide application will obtain the required state certificates.
3. Methods and techniques for plant management.
4. Cleaning and maintenance procedures.
5. Procedures for cannabis waste management.
6. Procedures or cleanup and notification in the event of a spill.
7. Proper use of PPE.

All employees will be required to go through training upon beginning employment. Employees will also be provided refresher training on an annual basis. Training will be documented, and training records will be kept as part of SLO Selects' record keeping process.

7.0 RECORD KEEPING

SLO Selects will maintain the following records:

1. logs for pesticide application;
2. logs for facility and equipment maintenance;
3. SDS sheets;
4. waste disposal;
5. notification records in the event of a spill; and
6. training records.

Records will be kept for a period of seven years. Records will be available in either hardcopy or electronic format for agency review.

ATTACHMENT F – INVENTORY MANAGEMENT PLAN

INVENTORY MANAGEMENT PLAN

Prepared by:

SAN LUIS OBISPO SELECTS, INC.

3919 Huasna Road

Arroyo Grande, CA 93420

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Arroyo Grande, California

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1.0 INTRODUCTION

San Luis Obispo Selects, Inc. (SLO Selects) has prepared this Inventory Management Plan for commercial cannabis activities located at 3919 Huasna Road, Arroyo Grande, California 93420 (Project Site). SLO Selects will implement the activities in two phases. Phase I is expected to be implemented in September 2019. Phase II implementation is expected in August 2020. Phasing is discussed in the associated Operations Plan.

The purpose of this Inventory Management Plan is to identify SLO Selects' procedures for managing inventory control, tracking, and other inventory procedures required by the County of San Luis Obispo (County), California Department of Food and Agriculture (CDFA), California Department of Public Health (CDPH), Bureau of Cannabis Control (BCC), and any other agency with regulatory oversight. SLO Selects will notify the local and state agencies of any substantial changes to this Inventory Management Plan.

1.1 FACILITY CONTACT INFORMATION

San Luis Obispo Selects
Krista Koenig – Owner/ General Manager
3919 Huasna Road
Arroyo Grande, CA 93420
(831) 588-6214

1.2 ROLES AND RESPONSIBILITIES

The General Manager or their authorized designee will serve the following roles:

1. Compliance Officer,
2. Inventory Control Manager,
3. Employee Training manager, and
4. Record Keeping Manager.

Descriptions of the roles and responsibilities listed above are discussed in the associated Operations Plan.

2.0 INVENTORY PROCEDURES

All cultivated and harvested cannabis flowers, nursery plants, manufactured and non-manufactured cannabis products, and all cannabis goods for retail delivery will be entered into the California Cannabis Track and Trace (CCTT) Metrc system. Cannabis plants and products will only be accessible to authorized employees. All required track and trace will be conducted by authorized employees that have been trained to use the CCTT Metrc system. Inventory control procedures for cultivation, manufacturing, and delivery are discussed below.

2.1 TRACK AND TRACE USER REQUIREMENTS FOR ALL COMMERCIAL CANNABIS ACTIVITIES

The Inventory Control Manager will manage cannabis product inventory control for all commercial cannabis activities at the Project Site by implementing the following measures:

1. The Inventory Control Manager will create and maintain an active and functional account within the CCTT Metrc system prior to engaging in any commercial cannabis activity, including the purchase, sale, testing, packaging, transfer, transport, return, destruction, or disposal, of any cannabis products.
2. The Inventory Control Manager or designated person will act as the CCTT Metrc system account manager. Any person authorized to be a CCTT Metrc account manager will be trained on the CCTT Metrc system prior to access or use. In addition, the account manager may authorize additional employees as users only if they receive CCTT Metrc system training.
3. Authorized account managers and employees authorized to use CCTT Metrc will attend and successfully complete all required CCTT Metrc system training, including any orientation and continuing education. All training records will be kept as part of SLO Selects' record keeping procedures discussed herein and in the associated Operations Plan.
4. The account manager and each authorized user will be assigned a unique login identification username and password. The account manager or each user accessing the CCTT Metrc system will be required to use their assigned login information and will not be permitted to use the login information of another employee or account manager. Under no circumstances will login information be shared or transferred to other individuals.
5. The Inventory Control Manager or authorized account manager will maintain a complete, accurate, and up-to-date list of all CCTT Metrc system users, including their full names and usernames.
6. Within three (3) calendar days, cancel the access rights of any track-and-trace user from the SLO Selects' track-and trace system account if that individual is no longer authorized to use the licensee's CCTT Metrc system account;
7. Notify the department immediately for any loss of access that exceeds three (3) calendar days;
8. The Inventory Control Manager or authorized account manager will monitor all compliance notifications from the CCTT Metrc system. All compliance notifications will be resolved in a compliance with the notification timing requirements.
9. No track-and-trace account manager, user, or other licensee, employee, or agent shall intentionally misrepresent or falsify information entered into the CCTT Metrc system.

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10. If SLO Selects loses access to the CCTT Metrc system for any reason, SLO Selects will prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access.
11. Once access to the CCTT Metrc system is restored, all inventory tracking activities that occurred during the loss of access shall be entered into the track-and-trace system within three (3) calendar days.
12. SLO Selects will document the date and time when access to the CCTT Metrc system was lost, when it was restored, and the cause for each loss of access.
13. SLO Selects will not transfer cannabis or nonmanufactured cannabis products to a distributor until such time as access to the system is restored and all information is recorded into the CCTT Metrc system.

2.2 TRACKING ADJUSTMENTS AND WASTE DISPOSAL

The Inventory Control Manager or authorized employee will adjust inventory for any commercial cannabis activity in the CCTT Metrc system in the event of the following:

1. spoilage or fouling of the cannabis products;
2. any event resulting in exposure or compromise of the cannabis products; and
3. any event where the destruction of the cannabis product is required by state or local regulatory agencies.

If cannabis products are being destroyed or disposed of, the Inventory Control Manager or their authorized designee will record in the CCTT Metrc system the following additional information:

1. name of the employee performing the destruction or disposal;
2. reason for destruction or disposal; and
3. name of the entity being responsible for cannabis waste disposal.

No cannabis products that have been packaged will be disposed of as cannabis waste unless the cannabis products have been removed from their packaging and rendered unrecognizable and unusable per state guidelines. Cannabis waste disposal is discussed in Attachment C – Waste Management Plan of the associated Operations Plan.

2.2.1 TIMING OF TRACKING

All transactions entered into the CCT Metrc system will occur by 11:59 p.m. Pacific Standard Time on the day the transaction occurred. The CCTT account manager or authorized employee will enter and record complete and accurate information and will correct any known errors entered immediately upon discovery.

2.3 LOSS OF ACCESS

If at any point SLO Selects loses access to the CCTT Metrc system, SLO Selects will prepare and maintain hard copy records of cannabis activities that were conducted during the loss of access. Records include the tracking and reporting items discussed above. Employees responsible for CCTT Metrc tracking will be trained on how to keep hard copy records in the event access to the CCTT Metrc system is lost.

In the event there is loss of access to the CCTT Metrc system, SLO Selects will document and notify the appropriate state agency of the following:

1. When access to the system is lost.
2. When access to the system is restored.
3. The cause for the loss of access, if known.
4. Once access is restored, all commercial cannabis activity that occurred during the loss of access will be entered into the CCTT Metrc system within three business days of access being restored.

SLO Selects will not transport, transfer, or deliver any cannabis products until access is restored and all information is recorded in the CCTT Metrc system.

2.4 CULTIVATION TRACK-AND-TRACE SYSTEM UNIQUE IDENTIFIERS (UID)

1. Within five (5) calendar days of the date SLO SELECTS's Inventory Control Manager or authorized designee was credentialed by the CDFA to use the track-and-trace system, the designated Inventory Control Manager shall request UIDs using the track-and trace system.
2. SLO Selects will only use UIDs provisioned and distributed by CDFA or CDFA's designee.
3. SLO Selects will maintain a sufficient supply of UIDs in inventory to support tagging.
4. SLO Selects will use the CCTT Metrc system to document receipt of provisioned and distributed UIDs within three (3) calendar days of physical receipt of the UIDs by the licensee.
5. Except as provided in section 8407 of this chapter, all cannabis shall be entered into the track-and-trace system by the licensee starting with seed, cannabis which has been propagated onsite or purchased from a licensed nursery, or seedling purchased from a licensed nursery pursuant to this chapter.
6. The UID shall accompany the cannabis products through all phases of the growing cycle, as follows:
 - (a) Immature plants will be assigned a UID to each established lot respectively. The lot UID will be placed in a position so it is visible and within clear view of an individual standing next to the immature lot to which the UID was assigned, and all UIDs will be kept free from dirt and debris. Each lot of immature plants will be uniform in strain or cultivar and will not have more than one hundred (100) immature plants at any one time. All immature plants in a lot will be labeled with the corresponding UID number assigned to the lot and will be contiguous to one another to facilitate identification by the department.
 - (b) Immature plants transferred from a SLO Selects, via a distributor, to a licensed cultivator will meet requirements of (6)(a) above. Each immature plant intended for retail sale will have a UID affixed, or be labeled with the corresponding UID number of the lot, and be recorded in the track-and-trace system prior to transfer from the licensed nursery.
 - (c) SLO Selects will apply a UID to all individual plants at the time any plant is moved to the designated canopy area or when an individual plant begins flowering. SLO Selects may tag individual immature plants prior to movement to the designated canopy area or prior to flowering.

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7. SLO Selects will ensure UIDs are attached to each mature plant. UIDs will be attached to the main stem, at the base of each plant. The UID will be attached to the plant using a tamper evident strap or zip tie and placed in a position so it is visible and within clear view of an individual standing next to the mature plant to which the UID was assigned.
8. UIDs will be kept free from dirt and debris.
9. SLO Selects employees will not remove the UID from the mature plant to which it was attached and assigned until the plant is harvested, destroyed, or disposed.
10. Each harvested batch of cannabis will be assigned a unique harvest batch name which will be associated with all UIDs for each individual plant, or portion thereof, contained in the harvest batch.
11. UIDs are required for all cannabis and nonmanufactured cannabis products and will be associated with the corresponding harvest batch name from which the cannabis and nonmanufactured cannabis products (i.e. pre-rolled joints and kief) were derived.
12. Upon destruction or disposal of any cultivated plants, the applicable UIDs will be retired in the track-and-trace system by the licensee within three (3) calendar days of the destruction or disposal and be performed in accordance with the Attachment C – Waste Management Plan of the associated Operations Plan.

2.5 CULTIVATION TRACK AND TRACE REPORTING REQUIREMENTS

1. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any and all transfers of cannabis or nonmanufactured cannabis products to another licensee prior to the movement of the cannabis or nonmanufactured cannabis products from the Project Site.
2. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any and all cannabis or nonmanufactured cannabis products physically received or rejected from another licensee within twenty-four (24) hours of receipt or rejection of the products.
3. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System any information related to the disposition of cannabis and nonmanufactured cannabis products, as applicable, on the licensed premises. All applicable information for each event listed below shall be reported in the track-and-trace system within three (3) calendar days of the applicable event:
 - a. Creating a planting of an immature plant lot;
 - b. Moving immature plants to a designated canopy area, or when an individual plant begins flowering, or when applying a UID to an immature plant;
 - c. Destruction or disposal of an immature or mature plant;
 - d. Harvest of a mature plant, or portion thereof. The following information must be reported into the track-and-trace system for each harvested plant, or portion thereof, or harvest batch:
 - i. The wet weight of each harvested plant, or portion thereof, which must be obtained by the immediately after harvest of the plant, or portion thereof;
 - ii. The net weight of each harvest batch;
 - iii. The weight of cannabis waste associated with each harvest batch;

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- iv. The unique name of the harvest batch and the initiating date of the harvest. For the purposes of this section, the initiating date of the harvest is the month, day, and year the first mature cannabis plant(s) in the harvest batch were cut, picked, or removed from the soil or other growing media. The initiating date of the harvest shall be recorded using the MM/DD/YYYY format. For example, January 1, 2018 would be recorded as 01/01/2018.
- 4. The Inventory Control Manager or authorized designee will report in the CCTT Metrc System each transfer of cannabis or nonmanufactured cannabis products to, or cannabis or nonmanufactured cannabis products received from, another licensee. Required information to be entered includes, but is not limited to:
 - a. Name, business address, and department or other licensing authority issued license number of the seller;
 - b. Name, business address, and department or other licensing authority issued license number of the purchaser;
 - c. Name and department issued license number of the distributor;
 - d. Date of sale, transfer, or receipt (month, day, and year) of cannabis or nonmanufactured cannabis products;
 - e. Weight (wet weight or net weight) or count of individual units of cannabis plants or nonmanufactured cannabis products sold, transferred, or received;
 - f. Estimated departure and arrival time;
 - g. Actual departure time;
 - h. Description for each item, including strain or cultivar, and all of the applicable information below:
 - i. plant;
 - ii. flower;
 - iii. leaf;
 - iv. shake;
 - v. kief; and
 - vi. pre-rolls.

2.6 CULTIVATION INVENTORY RECONCILIATION

SLO Selects' Inventory Control Manager will perform the following:

1. Reconciling all on-premises and in-transit cannabis or nonmanufactured cannabis products inventories at least once every thirty (30) calendar days.
2. Recording the net weight of all harvested cannabis once the majority of drying, trimming, and curing activities have been completed, or within sixty (60) calendar days from the initial harvest date, whichever is sooner.
3. SLO Selects will close out physical inventory of all cannabis and nonmanufactured cannabis product and UIDs, if applicable, prior to the effective date of any of the following changes to their license:
 - a. Voluntary surrender of a temporary license or annual license;

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- b. Expiration of an annual license; and
 - c. Revocation of a license.
 - d. description of the cannabis products with enough detail to identify the batch;
 - e. weight of or quantity of units in the batch;
 - f. best-by, sell-by, or expiration date of the batch, if any; and
 - g. location in the facility where the batch is kept.
4. Close-out of physical inventory includes, but is not limited to, all of the following items:
 - a. immature plants and their corresponding lot UID(s);
 - b. mature plants and their corresponding plant UID(s);
 - c. harvest batches and their corresponding UID(s);
 - d. nonmanufactured cannabis products and their corresponding UID(s); and
 - e. UIDs in the licensee's possession which have not been assigned in the CCTT Metrc System.
5. All sales and transfers will be documented as required herein.

2.7 MANUFACTURING TRACK AND TRACE

SLO Selects will track manufacturing activities in compliance with CDPH regulations using the state's CCTT Metrc system. The Inventory Control Manager or authorized employee will record all commercial cannabis activity in the CCTT Metrc system, including but not limited to, the following:

1. disposition of incoming and cannabis products;
2. packaging, repackaging, labeling, or relabeling of cannabis products;
3. sale of all cannabis products;
4. transportation of cannabis products to a licensee;
5. receipt of all cannabis products;
6. return of all cannabis products;
7. all destruction and disposal of cannabis products and cannabis waste;
8. laboratory testing and results of all cannabis products; and
9. any other activity as required by the state or local agency with regulatory authority.

The Inventory Control Manager will record in the CCTT Metrc system the following information for the activities described above:

1. name and type of the cannabis products;
2. unique identifier of the cannabis products;
3. amount of the cannabis products, by weight or count;
4. date and time of the activity or transaction; and
5. name and license number of other licensees involved in the activity or transaction.

For cannabis products being transported to the Project Site by a distributor, the following will occur:

1. All cannabis goods will be accompanied by a shipping manifest generated through the CCTT Metrc system, that includes items (1) through (5) above, as well as:

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

Upon pick-up or receipt of cannabis products for transport, storage, or inventory, the account manager or authorized employee will ensure that cannabis products received are the same as described in the shipping manifest and will record acceptance and acknowledgment of the cannabis products in the CCTT Metrc system.

The account manager or authorized employee will record and document in the CCTT Metrc system any discrepancies between the type or quantity of cannabis products specified in the shipping manifest and the type or quantity of cannabis products received.

The account manager or authorized employee will contact the licensee responsible for the originating cannabis product or transporting the product in the event of a discrepancy. Final resolution will be documented and recorded using the CCTT Metrc system.

SLO Selects will keep all records pertaining to cannabis activities and cannabis product transport as part of its record keeping producers discussed herein and in the associated Operations Plan.

2.8 MANUFACTURING INVENTORY RECONCILIATION

SLO Selects' Inventory Control Manager will perform the following:

1. Reconcile all inventories of cannabis products at least once every 14 days.
2. Keep an inventory log containing the following information for each batch:
 - a. name and license number of the manufacturer or cultivator that provided the batch;
 - b. date of entry into the storage area;
 - c. unique identifiers and batch number associated with the batch;
 - d. description of the cannabis products with enough detail to identify the batch;
 - e. weight of or quantity of units in the batch;
 - f. best-by, sell-by, or expiration date of the batch, if any; and
 - g. location in the facility where the batch is kept.
3. If the Inventory Control Manager finds a significant discrepancy between the inventory of stock and the inventory log or CCTT Metrc system that is outside of normal weight loss caused by moisture loss, the Inventory Control Manager will perform a full audit of the batch in which the discrepancy was found. A significant discrepancy in inventory means a difference in actual

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inventory compared to records pertaining to inventory of at least \$5,000 or 2 percent of the average monthly sales of the licensee, whichever is less. Average monthly sales are calculated by the average total sales over the past six months of operation.

If an audit finds missing inventory, the Inventory Control Manager will notify the San Luis Obispo County Sheriff's Department. The Inventory Control Manager will also contact the CDPH in writing and include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.

2.9 MANUFACTURING BATCH PRODUCTION RECORDS

SLO Selects will prepare a written batch production record every time a batch of cannabis is manufactured. The batch production record will accurately follow the appropriate manufacturing protocol, and each step of the protocol shall be performed in the production of the batch. The batch production record shall document complete information relating to the production and control of each batch, including all of the following details:

1. batch or lot number of the finished batch of cannabis product of all cannabis products used in the batch;
2. identity of equipment and processing lines used in producing the batch;
3. date and time of the maintenance, cleaning, and sanitizing of the equipment and processing lines used in producing the batch, or a cross-reference to records, such as individual equipment logs, and where this information is retained;
4. identification number assigned to each component (or, when applicable, to a cannabis product received from a supplier for packaging or labeling as a cannabis product), packaging, and label used;
5. identity and weight or measure of each component used;
6. statement of the actual yield and a statement of the percentage of theoretical yield at appropriate phases of processing;
7. actual results obtained during any monitoring operation; and
8. results of any testing or examination performed during the batch production, or a cross-reference to such results.

SLO Selects will document, at the time of manufacturing a batch, the following:

1. The date on which each step of the manufacturing protocol was performed.
2. The initials of the persons performing each step, including:
 - a. initials of the person responsible for weighing or measuring each component used in the batch;
 - b. initials of the person responsible for verifying the weight or measure of each component used in the batch;
 - c. initials of the person responsible for adding the component to the batch; and,
 - d. initials of the person responsible for verifying the addition of components to the batch.

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SLO Selects will document, at the time of packaging and labeling operations, the following:

1. an actual or representative label, or a cross-reference to the physical location of the actual or representative label specified in the manufacturing record;
2. expected number of packaging and labels to be used, the actual quantity of the packaging and labels used, and, when label reconciliation is required, reconciliation of any discrepancies between issuance and use of labels; and
3. results of any tests or examinations conducted on packaged and labeled cannabis products (including repackaged or relabeled cannabis products), or a cross-reference to the physical location of such results.

During quality control of manufactured products produced onsite or offsite, the Inventory Control Manager will perform the following:

1. review the batch production record;
2. review all required monitoring operation(s) required by the CDPH;
3. review the results of all tests and examinations, including tests and examinations conducted on components, in-process materials, finished batches of cannabis product, and packaged and labeled cannabis products;
4. either approve and release, or reject, the batch for distribution; and
5. either approve and release, or reject, the finished cannabis product, including any repackaged or relabeled cannabis product.

SLO Selects will document any required material review and disposition decision. SLO Selects will provide batch production documents that comply with the following:

1. Contains the actual values and observations obtained during monitoring and, as appropriate, during verification activities.
2. Is accurate, legible, and does not cross out information that can no longer be read.
3. Is concurrent with the activity documented.
4. Is detailed as necessary to provide history of work performed, including:
 - a. information adequate to identify any associated manufacturing facility (e.g., the name, license number, and when necessary, the location of the facility);
 - b. the date and the time of the activity documented, as necessary;
 - c. the signature or initials of the person performing the activity; and the identity of the product, the lot number or batch identifier, if any.

2.10 DELIVERY SERVICE TRACK AND TRACE REQUIREMENTS

SLO Selects will track all retail delivery activities in compliance with BBC regulations using the state's CCTT Metrc system. The Inventory Control Manager or authorized employee will record all commercial cannabis activity in the CCTT Metrc system, including but not limited to, the following:

1. disposition of incoming cannabis products;
2. sale of all cannabis products;

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3. receipt of all cannabis products;
4. return of all cannabis products;
5. all destruction and disposal of cannabis products and cannabis waste; and
6. any other activity as required by the state or local agency with regulatory authority.

2.11 RECEIVING SHIPMENTS OF INVENTORY FOR DELIVERY

SLO Selects will perform the following pertaining to receiving shipments:

1. SLO Selects will only receive shipments of inventory of cannabis products from a licensed distributor.
2. SLO Selects will accept shipments of cannabis during operating business hours.
3. During business hours, delivery vehicles of cannabis products will enter the Project Site through the driveway entrance gate. Delivery drivers will bring cannabis materials to the delivery building shown on the Site Plans in Attachment A of the associated Operations Plan.

The Inventory Control Manager or authorized employee will record in the CCTT Metrc system the following information for shipments received, which should be included on the shipping manifest:

1. the name, license number, and premises address of the licensee transporting the cannabis products to the Project Site;
2. name and type of the cannabis products;
3. unique identifier of the cannabis products;
4. amount of the cannabis products, by weight or count;
5. the sell-by or expiration date provided on the package of cannabis goods, if any;
6. the price the licensed retailer paid for the cannabis goods, including taxes, delivery costs, and any other costs;
7. date and time of the activity or transaction;
8. name and license number of other licensees involved in the activity or transaction; and
9. driver's license number of the personnel transporting the cannabis products, and the make, model, and license plate number of the vehicle used for transport.

Upon receipt of cannabis products for inventory and storage, the Inventory Control Manager or authorized employee will ensure that cannabis products received are the same as described in the shipping manifest and will record acceptance and acknowledgment of the cannabis products in the CCTT Metrc system. In addition, the Inventory Control Manager or authorized designee will inspect all cannabis products received to ensure products have not been damaged and are not defective.

The Inventory Control Manager or authorized employee will record and document in the CCTT Metrc system any discrepancies between the type or quantity of cannabis products specified in the shipping manifest and the type or quantity of cannabis products received. The Inventory Control Manager or authorized employee will contact the licensee responsible for the originating cannabis product or transporting the product in the event of a discrepancy. Final resolution will be documented and recorded using the CCTT Metrc system.

SLO Selects will keep all records pertaining to cannabis activities and cannabis product transport as part of its record keeping procedures discussed in the associated Operations Plan.

2.12 DELIVERY INVENTORY RETURNS AND PRODUCT RECALL

If the Inventory Control Manager, upon receiving and inspecting a cannabis product from a licensed distributor, discovers that the cannabis product is defective or damaged, SLO Selects may return the cannabis product to the distributor or selling licensee only in exchange for a non-defective or non-damaged version of the same type of cannabis products or in exchange for a cannabis product of equal value. All returns will be entered into the CCTT Metrc system.

SLO Selects may elect to accept a customer's return of cannabis products that were previously sold to that customer in the event the cannabis product is defective, damaged, expired, or for other reasons SLO Selects deems acceptable. SLO Selects will not resell cannabis products that have been returned. All returned cannabis products will be destroyed as discussed herein and in Attachment C – Waste Management Plan of the associated Operations Plan.

In the event of a recall of cannabis products delivered by SLO Selects, SLO Selects will use the CCTT Metrc system to identify the customer(s) to which the product has been delivered. SLO Selects will make every attempt (i.e. phone, email, mail) to contact the customer and arrange for a product return. SLO Selects will coordinate cannabis product(s) recall returns with the licensed cannabis operator that reported the recall.

2.13 DELIVERY INVENTORY RECONCILIATION

SLO Selects' Inventory Control Manager will perform the following:

1. Reconcile all inventories of cannabis products at least once every 14 days.
2. If the Inventory Control Manager finds a significant discrepancy between the inventory of stock and the inventory log or CCTT Metrc system that is outside of normal weight loss caused by moisture loss, the Inventory Control Manager will perform a full audit of the batch in which the discrepancy was found. A significant discrepancy in inventory for retail delivery means a difference in actual inventory compared to records pertaining to inventory of at least \$5,000 or 2 percent of the average monthly sales of the licensee, whichever is less. Average monthly sales are calculated by the average total sales over the past six months of operation.

If an audit finds missing inventory, the Inventory Control Manager will notify the BCC and include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.

3.0 DELIVERY PROCEDURES

3.1 CANNABIS PRODUCTS FOR SALE

As part of delivery operations, SLO Selects will not accept, possess, or sell cannabis products that are not pre-packaged for final sale.

SLO Selects will not make any cannabis products available for sale or delivery to a customer unless all the following are true:

1. the cannabis products were grown onsite;
2. the cannabis products were sold to and received from a licensed distributor;
3. the Inventory Control Manager has verified that the cannabis products have not exceeded their expiration or sell-by date if one is provided; and
4. the cannabis products are tested and labeled in compliance with state regulations.

In the case of live plants and seeds:

1. SLO Selects will not sell live plants unless the plant is immature and is not flowering.
2. SLO Selects will not use pesticides on live plants in its possession.
3. SLO Selects will not sell any other live plants.
4. SLO SELECTS will ensure that the package containing any seeds states, "This product has not been tested pursuant to the Medicinal and Adult-Use Cannabis Regulation and Safety Act."

3.2 IDENTIFICATION VERIFICATION

Cannabis products designated for "Medical Use" will only be sold to persons who are at least 18 years of age and possesses a valid physician's recommendation. SLO Selects will confirm the customer's age, identity, and physician's recommendation.

Cannabis products designated for "Adult Use" will only be sold to persons 21 years of age or older. SLO Selects will confirm the customer's age and identity.

Acceptable forms of identification include the following:

1. A document issued by a federal, state, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to, a valid motor vehicle operator's license, that contains the name, date of birth, height, gender, and photo of the person;
2. A valid identification card issued to a member of the Armed Forces that includes the person's name, date of birth, and photo; or,
3. A valid passport issued by the United States or by a foreign government.

Customer identification and physician's recommendation, if required, will be kept in SLO Selects' patient record database.

3.3 DELIVERY PREPARATION

Delivery procedures include the following:

1. For medical use customers, SLO Selects will verify the customer's age, identity, and physician's recommendation prior to preparing the cannabis product(s) for delivery.
2. For adult use customers, SLO Selects will verify the customer's age and identity prior to preparing the cannabis product(s) for delivery.
3. All customer requests for the delivery of cannabis products will be received and prepared by the by an authorized employee prior to the delivery employee leaving the facility with the cannabis products to be delivered.
4. SLO Selects may prepare more than one delivery request and send out multiple cannabis products for delivery.
5. SLO Selects may prepare additional cannabis products for delivery in the event that a delivery request is made while the driver is out making deliveries.
6. Customers requesting adult use cannabis products will only receive cannabis products tested and labeled for "Adult Use Only".
7. Customers requesting cannabis products for medical use will only receive cannabis products tested and labeled for "Medical Use Only".

3.4 DELIVERY REQUEST RECEIPT

SLO Selects will prepare a delivery request receipt for each delivery of cannabis products. The delivery request receipt will contain the following:

1. SLO Selects' name and address.
2. The first name and employee number of the delivery employee who delivered the order.
3. The first name and employee number of the employee who prepared the order for delivery.
4. The first name of the customer and a customer number assigned by SLO Selects for the person who requested the delivery.
5. The date and time the delivery request was made.
6. The delivery address.
7. A detailed description of all cannabis products requested for delivery. The description will include the weight, volume, or any other accurate measure of the amount of all cannabis products requested.
8. The total amount paid for the delivery, including any taxes or fees, the cost of the cannabis products, and any other charges related to the delivery.
9. Upon delivery, the date and time the delivery was made, and the signature of the customer who received the delivery.

At the time of the delivery, the SLO Selects delivery employee will provide the customer who placed the order with a copy of the delivery request receipt. The delivery employee will retain a signed copy of the delivery request receipt for the Selects' records.

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For the purposes of this section, an employee number is a distinct number assigned by SLO Selects to their employees that would allow the licensed retailer to identify the employee on documents or records using the employee number rather than the employee's full name. SLO Selects will be able to identify the employee associated with each employee number upon request from the BCC.

For the purposes of this section, a customer number is a distinct number assigned by SLO Selects to a customer that would allow SLO Selects to identify the customer in documents or records using the customer number rather than the customer's full name. SLO Selects will be able to identify the customer associated with each customer number upon request from the BCC.

3.5 DELIVERY TRANSPORTATION PROCEDURES

Deliveries and delivery drivers will adhere to the following:

1. Delivery employees will not make deliveries for other licensed cannabis retailers or other non-cannabis businesses while making deliveries on behalf of SLO Selects. SLO Selects' delivery employee will depart and return to the same facility before taking possession of any cannabis products from another licensed cannabis retailer, or non-cannabis products from another business to perform deliveries.
2. Delivery employees will not leave the facility with cannabis products without at least one delivery order that has already been received and processed.
3. While making deliveries, delivery employees will not carry cannabis products valued in excess of \$5,000 at any time (valued by the current retail price of all cannabis products carried by the employee) of which \$2,000 must be for orders that have been processed.
4. Delivery employees will ensure that cannabis products are not visible to the public while inside the vehicle. All cannabis products will be stored in a locked box, container, or secure area within the vehicle (e.g. trunk of vehicle) that is only accessible to the delivery driver, General Manager, or authorized designee.
5. Delivery of cannabis products will not be made through the use of an unmanned vehicle, or through the window of the delivery vehicle. No cannabis products will be sold or delivered to a person in a motorized vehicle.
6. Delivery drivers will only travel in an enclosed motor vehicle. Only authorized SLO Selects employees will operate the delivery vehicle.
7. Delivery employees will not carry any other non-cannabis products for sale while conducting deliveries except for cannabis accessories and SLO Selects' branded merchandise or promotional materials.
8. All deliveries will be made by an authorized delivery employee of SLO Selects.
9. All deliveries of cannabis products will be made in person.
10. Cannabis products will only be delivered to a physical address in California. Delivery employees will not leave the State of California while possessing cannabis products for delivery.
11. SLO Selects will not deliver cannabis products to an address located on publicly owned land or any address on land or in a building leased by a public agency. This prohibition applies to land held in trust by the United States for a tribe or an individual tribal member unless the delivery is authorized by and consistent with applicable tribal law.

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12. Prior to arrival at any delivery location, an authorized employee must have received a delivery request from the customer and provided the delivery request receipt to the delivery driver electronically or in hard copy. The delivery request receipt provided to the delivery driver will contain all of the information required in Section 3.4 above, except for the date and time the delivery was made, and the signature of the customer.
13. Prior to providing cannabis products to a delivery customer, a delivery employee shall verify the age and identity of the customer.
14. All cannabis products will be delivered to customers in opaque exit packaging.
15. Delivery employees will not leave cannabis products in an unattended motor vehicle unless the motor vehicle is locked and equipped with an active vehicle alarm system.
16. The delivery driver may make additional deliveries while out in the delivery vehicle and only if the driver receives a delivery request and receipt required by Section 3.4 above. If the delivery driver does not have any delivery requests to be performed for a 30-minute period, the delivery driver will not make any additional deliveries and will return to the facility. Required meal breaks will not count toward the 30-minute period.
17. Upon returning to the facility, all undelivered cannabis products will be returned to inventory and all necessary inventory and track-and-trace records shall be updated as appropriate that same day.
18. Upon returning to the facility, all cash will be transferred to the General Manager or authorized designee.
19. Delivery drivers will not consume cannabis products while making deliveries.

3.6 DAILY LIMITS

SLO Selects will not sell more than the following amounts to a single adult-use cannabis customer in a single day:

1. 28.5 grams of non-concentrated cannabis.
2. Eight (8) grams of concentrated cannabis, including concentrated cannabis contained in cannabis products.
3. Six (6) immature cannabis plants.

SLO Selects will not sell more than the following amounts to a single medicinal cannabis patient, or to a patient's primary caregiver purchasing medicinal cannabis on behalf of the patient, in a single day:

1. 8 ounces of medicinal cannabis.
2. 12 immature cannabis plants.
3. If a valid physician's recommendation contains a different amount than the limits listed in this section, the medicinal cannabis customer may purchase an amount of medicinal cannabis consistent with the patient's needs as recommended by a physician.

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3.7 FREE CANNABIS PRODUCTS FOR MEDICAL PATIENTS

SLO Selects or any of its employees will not provide free cannabis products to any person unless the person holds a medical identification card and all the following criteria are met:

1. Free cannabis products are provided only to a medicinal cannabis patient or primary caregiver for the patient in possession of a valid identification card issued in compliance with state guidelines.
2. The cannabis products comply with all applicable laboratory testing requirements under this division.
3. Prior to being provided to the patient or primary caregiver, the cannabis products have been properly recorded in the track and trace system as belonging to the retailer.
4. The cannabis products will not leave the licensed premises unless placed in an opaque package as required for purchased cannabis products.
5. The cannabis products will be applied toward the daily purchase limit for a medicinal cannabis customer as discussed above.
6. The transaction is properly recorded in SLO Selects' inventory records and the track and trace system discussed in Attachment E.

In addition to the above requirements, SLO Selects may donate cannabis products and the use of equipment in compliance with any compassionate use, equality, or other similar program administered by the County of San Luis Obispo.

4.0 TRAINING

SLO Selects' Employee Training Officer will be responsible for ensuring employees are trained on the contents of this Inventory Management Plan. The Employee Training Officer will also ensure that employees authorized to access the CCTT Metrc system have received the appropriate training offered by the CCTT Metrc system administrator. Training records will be accessible to regulatory inspection upon request.

5.0 RECORDS

SLO Selects' Record Keeping Manager will maintain the following records:

1. records relating to branding, packaging and labeling;
2. all supporting documentation for data or information entered into the CCTT Metrc System;
3. documentation associated with loss of access to the track-and-trace system
4. all UIDs assigned to product in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system must be retained for six (6) months after the date the tags were retired;
5. transportation bills of lading and/or shipping manifests for completed transports and for cannabis products in transit;
6. inventory logs and records;
7. vehicle ownership records;
8. batch production records;
9. records relating to destruction of cannabis goods;
10. employee personnel and training records;
11. contracts with other state licensed cannabis businesses;
12. records relating to tax payments; and
13. any records required by regulatory agencies.

SLO Selects will keep all records for a minimum of seven years, or as required by the County and state agencies with regulatory oversight. Records will be available in either hard copy or electronic format for review by agency personnel upon request.

