

From: [Jacob Patterson](#)
To: [Lemos, June](#); [Miller, Tabatha](#)
Cc: [O'Neal, Chantell](#)
Subject: Public Comment -- 10/25/21 CC Mtg., Cannabis Agenda Items
Date: Saturday, October 23, 2021 11:37:43 AM
Attachments: [California's legal weed industry can't compete with illicit market - POLITICO.pdf](#)

[https://link.edgepilot.com/s/829b7b56/peok7KTSv0y-Gmx4n92wuQ?
u=https://www.politico.com/news/2021/10/23/california-legal-illicit-weed-market-516868](https://link.edgepilot.com/s/829b7b56/peok7KTSv0y-Gmx4n92wuQ?u=https://www.politico.com/news/2021/10/23/california-legal-illicit-weed-market-516868)

City Council,

Please read the attached article (also linked above) to review the practical realities that demonstrate how this might be a fun academic exercise for planning staff and some law students, it isn't a prudent use of our local resources. I know you all have the best intentions but the cannabis ordinance revisions under discussion tonight are likely an impractical waste of time because the effort is unlikely to result in significant tangible benefits to the town. It is also quite clear that the proposals are way more complicated, and unnecessarily so, compared to what we need.

There is nothing fundamentally wrong with the current ordinance and it only needs a few simple tweaks, which could be accomplished in a much shorter period of time and with less complexity than trying to revisit the entire regulatory scheme. The source of our recent issues has been with CDD planning staff not being competent or capable of doing their jobs and applying our current regulations, not significant problems with the existing ordinance. The only changes that are advisable are adding in an explicit buffer zone with a smaller distance (e.g., 150 feet or 1/2 a City block) for the state default buffer zones. There is no need to craft a different local definition for youth center and there is no need to complicate anything further by crafting a special microbusiness definition, which is not even a land use category but a type of stare (not local) cannabis business license type.

All we need is a simple amendment that does three things:

1. Determine the zoning districts where cultivation is permitted without any (illegal and unenforceable) local preference and without an unnecessary "equity" component.
2. Add in an explicit buffer zone that is greater than zero but less than 600 feet.
3. Get rid of the unnecessary prohibition on retail storefronts in the industrial zoning districts so the City has appropriate zoning districts (i.e., heavy and light industrial) where a business using the microbusiness model can locate without introducing the industrial manufacturing or processing activities to non-industrial zoning districts where they do not belong.

These objectives are minor adjustments to our current regulatory scheme and don't require an extended process. The drafting could easily be accomplished in a day or two, not months. Once that is accomplished, the CEQA review can proceed based on the fully-crafted ordinance that is simple. The more complicated you make things, the more complicated and expensive the CEQA process will take unless you put the zoning ordinance on the ballot and avoid the CEQA requirement that way.

Regards,

--Jacob

CALIFORNIA

California's legal weed industry can't compete with illicit market

Local government opposition, high taxes and competition from unlicensed businesses are complicating the state's push to build a thriving legal market.



California's cannabis law lets local officials decide whether to open the door to cannabis or slam it shut. So far, most are opting for the latter. | Justin Sullivan/Getty Images

By **ALEXANDER NIEVES**

10/23/2021 07:00 AM EDT



LOS ANGELES — California's cannabis market is booming nearly five years after voters legalized recreational weed. But there's a catch: the vast majority of pot sales are still underground.

Rather than make cannabis a Main Street fixture, California's strict regulations have led most industry operators to close shop, flee the state or sell in the state's illegal market that approaches \$8 billion annually, twice the volume of legal sales.

Advertisement

Local government opposition, high taxes and competition from unlicensed businesses are complicating California's push to build a thriving legal market. Many of those factors are baked into California law, including rules allowing city leaders to shut out licensed cannabis enterprises. Meanwhile, the state has relaxed penalties against illegal operations in the name of racial justice.

Infighting between industry groups and lobbying dysfunction in Sacramento have stalled potential legislative fixes, with no clear end in sight. The scale of those problems has California's iconic cannabis industry — the legal side, at least — lagging behind other states that have regulated the market.

“You don't have a real cannabis industry if the dominant portion of it has no interest in being legal,” said Adam Spiker, executive director of the Southern California Coalition, a cannabis trade association. “There's no other regulated industry in the world that I know of that operates like that.”

Licensed cannabis shops offering legal goods are sparsely scattered across the state — there are roughly 2 per 100,000 people, one of the lowest rates in the nation among states that support legal recreational sales.

By comparison, Oregon has 17.9 retail shops for every 100,000 residents. Colorado boasts a similar ratio, and Washington state's rate is more than triple California's.

California lags behind other states in pot shops per capita

Dispensaries per 100,000 residents in Western states with recreational sales, October 2021

Alaska	20.3
Oregon	17.9
Colorado	14.2
Washington	6.6
Nevada	2.8
California	2.1

California has just 823 licensed brick-and-mortar cannabis shops, but close to 3,000 retailers and delivery services operate in the state without a permit, a February 2020 market analysis by Marijuana Business Daily found.

The unchecked cannabis ecosystem has caused major economic and environmental damage in California. Many of the state's estimated 50,000 illegal cultivation sites [have been found to use banned pesticides](#) that can poison wildlife and water supplies and are believed to account for hundreds of millions of gallons in water stolen from farms and neighboring communities each year.

Law enforcement agencies in the last few months alone have broken up sprawling grow operations in the arid Antelope Valley and urban Alameda County, discovering around 50 tons of processed cannabis goods and more than 100,000 plants, a haul valued well above \$1 billion.

California Attorney General Rob Bonta announced earlier this week that the state had seized 165 weapons and more than 33 tons of infrastructure like water lines and toxic chemicals after conducting close to 500 raids this year.

“The victims of illegal marijuana cultivation are many and the toll is severe,” he said during a news conference. “Families whose water supply is polluted by outlawed pesticides, exploited labor exposed to dangerous and illegal working conditions, farmers deprived of clean soil and water.”

California, like many states, has lowered its penalties on illegal marijuana businesses, a response to a disproportionate number of arrests targeting communities of color under drug criminalization. Many in the industry say they generally support criminal justice reforms, but that the current penalty of a misdemeanor and \$500 fine is simply too low to dissuade illicit activity.

Unlicensed dispensaries shuttered for city code enforcement violations often pop up again, sometimes right down the street. And cultivation sites like the one raided in Antelope Valley often resume operations just days later, law enforcement officials concede.

Every state establishing a legal market has had to contend with illicit operations, but the underground market in California is far more entrenched. Many of today's unlicensed businesses legally served customers for decades under the state's medical marijuana laws that passed in 1996 but went underground after voters approved the recreational pot initiative Proposition 64 passed in 2016. Some operated in cities that banned weed sales, while others balked at the new regulatory fees and taxes.

The new law forced longtime business owners to make tough decisions, said Elizabeth Ashford, vice president of communications at cannabis delivery company Eaze.

"They were totally allowed under the law just minutes ago," she said looking back to when the new regulations were established. "Did anybody really think those folks would just be like, 'Well okay, we're just going to close our doors'?"

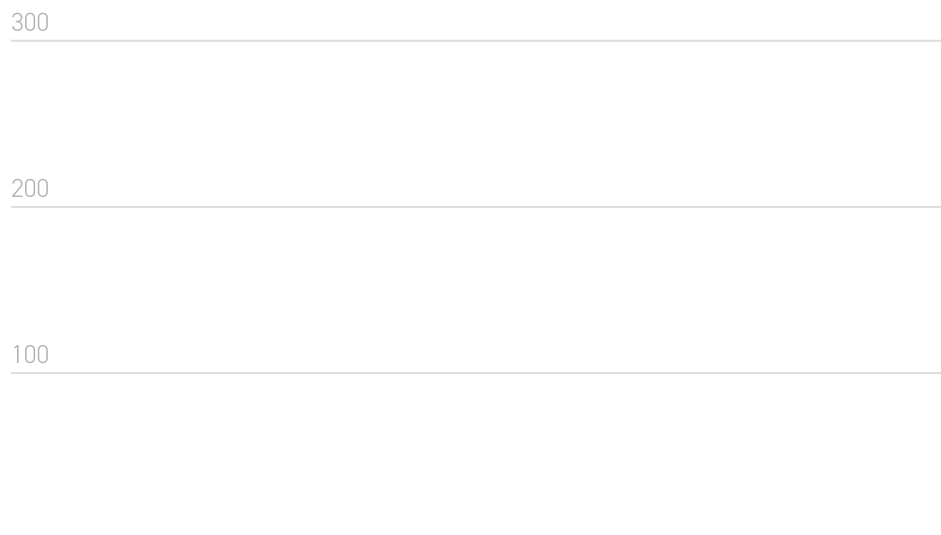
AD

California's cannabis law lets local officials decide whether to open the door to cannabis or slam it shut. So far, most are opting for the latter.

A whopping 68 percent of California cities ban cannabis retail, including wide swaths of the Central Valley. Other areas have imposed strict caps on the number of available licenses, limiting market growth.

Most California cities still ban cannabis sales

Data collected October 2021



Cities with dispensaries open

Chart: Alexander Nieves / POLITICO • Source: Hirsh Jain / Ananda Strategy

San Diego has just 25 pot shops for a population of 1.4 million; San Jose has 16 stores for 1 million people.

Some local officials say the industry harms children or argue dispensaries would attract crime. Others point to the difficulty of drafting ordinances, complying with strict environmental reviews and dealing with potential lawsuits from applicants who aren't awarded licenses.

Public meetings in places like Mountain View in the Silicon Valley and Anaheim have devolved into hours-long marathons filled with protests and name calling when the topic of allowing cannabis shops comes up.

Spiker, who helps develop local cannabis regulations, said some elected officials fear a pro-cannabis stance could cost them their seats.

“Just because Prop. 64 passed in a community at say 60 percent, it doesn't mean that the 40 percent that voted ‘no’ won't organize a recall effort or a strenuous bid to get you thrown out of office your next election,” he said.

The dearth of retail stores — and legal shelf space — gives unlicensed businesses a large, unserved consumer base. It also contributes to an oversupply of goods produced by the state's [6,000 licensed cultivators](#) that has caused the price of wholesale cannabis to plummet, hurting legal growers.

“Local control has, let's just be honest, crippled the California market and prevented it from reaching its potential,” said Hirsh Jain, founder of cannabis consulting firm Ananda Strategy.

Industry leaders say there is little chance state lawmakers will take away that power, largely due to fierce support for local control from law enforcement and city and county officials.

Citizen initiatives and [Covid-related budget deficits have spurred](#) some jurisdictions to open their arms to weed. By Jain's count, 28 cities will open their first dispensaries in 2022 and 37 more that will pass a retail ordinance.

Businesses that manage to secure a license have another problem: competing with their unregulated competitors.

The price of cannabis products sold in legal dispensaries can be two to three times higher than nearly identical items sold in unlicensed shops, which aren't subject to cultivation or excise taxes that drive up costs for retailers.

Some buyers see little incentive to pay more for a legal product.

“Price is the biggest motivator for consumer choice,” Ashford said. “We know that from our own data, there's no question that if you make things less expensive people will buy them.”

The difference between the legal and the illegal is not always obvious. Underground dispensaries are often indistinguishable from licensed shops and sell similar-looking items that may be counterfeit or diverted from the legal market. Illicit delivery services are also listed right next to legitimate operators on platforms like Google and Yelp.

AD

Regulators worry that products purchased from unlicensed retailers pose a

regulators warn that products purchased from unlicensed retailers pose a public health risk, pointing to a rash of lung illnesses related to untested vape cartridges that killed 68 people and hospitalized more than 2,800 nationwide in 2019.

Pro-cannabis state lawmakers have tried unsuccessfully to slash the tax burden in the face of opposition from SEIU, the powerful union that helped bankroll the 2016 ballot measure. The union disagrees with the industry argument that reducing tax rates will spur growth and eventually boost tax revenue, said Robert Harris, a lobbyist for SEIU.

“I’ve never heard of an industry that didn’t say, ‘Reduce our taxes, we’ll sell more and you’ll make more,’” he said.

Leaders within the cannabis industry say finding a solution for the tax problem is their top priority for next year. Nicole Elliott, director of the state Department of Cannabis Control, telegraphed that they might get support from Gov. Gavin Newsom, who championed Prop. 64 while running for office in 2016.

“I imagine that the administration will be very happy to partner with the Legislature on those discussions,” she said.

But finding consensus on a tax plan will be challenging. There is disagreement, for instance, about whether a tax cut should happen on the cultivation or retail side.

Lawmakers and Capitol staffers say this disunity makes legislative fixes nearly impossible to pass and perpetuates the status quo. That’s a scenario the industry can’t afford, given “the overhead costs that the illegal guy doesn’t do,” Spiker warned.

“The divide between legal and illegal is too big a gap to overcome.”

October 25, 2021 Re: City Council Cannabis Moratorium, Oct./Nov./Dec. 2021

Agenda Items: 5H-21-557; 8E-21-547; 8F-21-550; 8G-21-546; 8H-21-549; and 8i-21-552

Mayor, Council, Manager, Staff:

As you gather to discuss potential changes to the City's cannabis ordinances, please be mindful that you have been tinkering with the Sunshine Holistic permit (144 N. Franklin Street) languages since at least December 8, 2019. During that time the applicant has sought permit in the CBD and in our Neighborhood for every aspect of the cannabis trade. Cultivation, Nursery, Manufacturing, Distribution, and Retail. On each occasion and variation of permit application Sunshine has been pushed back. Twice at the Planning Commission level and twice by the City Council. Given the failure of Sunshine to prevail, it is understood that the voting ties also represented voting rejections. All of the above (including erratic scheduling and last minute cancellations of key meetings) have depleted excessively applied administrative resources, salaried tax dollars, and whatever faith in transparent government existed at the beginning of this marathon. That failure to be transparent includes certain Public Noticing defects which have previously been brought to your attention. Meanwhile other dispensary applications are beginning to flood the CBD. Notoriously you discriminately notified the 144 N. Franklin St. Applicant and other CBD Cannabis Dispensary Applicants of this cannabis related agenda before you, but *not* the impacted neighborhoods. This is particularly disconcerting by the fact that tonight's October 25 Agenda Packet explicitly outlines your intention to discuss (possibly legislate) the elimination of Buffer Zone distances designed to protect residential neighborhoods from certain incompatible businesses which threaten to negatively impact those neighborhoods.

Now in the form of a Moratorium comes *more* potential ordinance/regulation language pertaining to the "where and how" cannabis businesses can come into the City. As those of us who have not been paid to participate in this revolving ordinance rodeo know too well – newly proposed cannabis projects are required to pass minor use permit review. Please acknowledge that *this is not the time* to even consider changing the existing Permit Application Review language to "Permit By Right," which will effectively eliminate public hearings and other opportunities for citizen/merchant/ residential neighborhood objections designed to democratically occur within the case-by-case approach to permitting. Changing the language to Permit By Right would cancel *all* of the neighborhood concerns expressed by the hundreds of Petition Signers and Public Meeting Protestors and Neighborhood Impact Speakers who passionately opposed non-compatible residential land uses adjacent to cannabis retail uses. (Like the failed 144 N. Franklin St. cannabis applications and appeals since December of 2019). Imagine: suddenly the houses along McPherson; the Alleyway west of McPherson; both sides of Franklin from Oak St. to City Hall; and the core businesses lining Laurel and Redwood, *all* having the right to convert to a sort of Cannabis Coney Island and ultimately becoming the primary attraction to Fort Bragg. We strongly urge you to consider the disruptive neighborhood and community price tag of this. With its deep pocketed abilities to displace existing businesses, tenants, and homeowners - the cannabis industry is uniquely positioned to devour Fort Bragg's current path. The current path leads to an exciting regionally unique Arts and Culture District fed by local artisan incubated retailers, galleries, restaurants, and crafts people. *That path* leads directly to a very sustainable lodging industry (more successful than we already have) that keeps visitor interest to stays of longer than two days. Do you as our political leaders really want to dismantle and destroy all the good work done by our Chamber, Visit Fort Bragg, Economic Development Department, Lodging Industry Promoters, Arts Councils, Mural Coordinators,

and energetic individual promoting done daily by the people of Fort Bragg? Do you wish to lose this vibrant vision and end up like Eureka or Crescent City, or the mish mash of other coastal towns that have lost their way?

Then please stop this new alternative Wild West distorted vision which seems to be germinating in the minds of certain Council member(s), as a mission statement that “cannabis is like and should be treated like any other business.” We would stomp on that fire by reminding you that even the most benign dispensaries and legal grows run parallel to a much larger, illegal supply chain that law enforcement throughout the Triangle are now acknowledging has a very dark side to it. The dark side of precious water diversion, fish, deer, bear destruction, pesticide abuse, clear cutting of redwood forests, human trafficking, cash and product problems that attract criminal elements and serious crimes. Fort Bragg and its neighborhoods (though miles away from the source of these problems), do not have built in immunities from these far reaching effects. Cannabis task forces and law enforcement agencies are vigorously attempting to protect and support the legal, small legacy growers and the dispensaries at the retail end of their supply chains, in places like Fort Bragg. To effectively do so (and to protect our natural resources along with it) - state, county, and local authorities have expressed the belief that it is first necessary to eradicate the illegal, black market side of the cannabis industry. These urgent public safety documents add to the reasons why we ask you not to eliminate the language of Permit Review, or to declare all neighborhoods to be the same. It is why our police will tell you they need more resources. Our police will also likely tell you that the complexities of cannabis do a lot to explain why 90% or more of other communities (large and small presently reportable to 2019) are confirmed to be safer from crime than Fort Bragg.

Which partially explains why cannabis is still a controlled substance; and why it is more closely associated with liquor stores and gun shops, than clothing and stationary stores. *All retail businesses are not alike.* And which is why we urge you, our City Government to review dispensary applications applicant- by- applicant. This is the meaning of impact, and the reason why Neighborhood Impact Studies generally precede aggressive changes in policy, regulation, and ordinance.

Because of its unique composition, *our* neighborhood including its business interests, banks, pedestrian activities, major grocery store, and post office – has soundly rejected the idea of making it a given right to locate a retail cannabis dispensary in that neighborhood. Please respect this history and the thoughts we have provided when considering the topic, and before jamming us through the process *again*.

PROPOSAL: To show proper restraint from becoming an autocratic regime, create a CITIZEN’S BALLOT INITIATIVE TO FIX AND REPLACE THE CITY’S CANNABIS REGULATIONS.

We look forward to a new, creative, resourceful era of inclusive community planning in wonderful Fort Bragg. How appropriate that October is National Community Planning Month! Please let us know how we can assist you with human resources dedicated to a plan that will sustain Fort Bragg, while making all of us proud.

Sincerely,

Bill Mann

Susanne Rogers

From: [Jacob Patterson](#)
To: [Lemos, June](#); [Munoz, Cristal](#)
Subject: Public Comment -- 10/25/21 CC Mtg., Item Nos. 8E, 8F, 8G, 8H
Date: Monday, October 25, 2021 4:46:40 PM
Attachments: [MUP 8-21 CDP 5-21 Application-redacted.pdf](#)

City Council,

Please see the attached application for a redux of the Sunshine-Holistic MUP application at 144 N. Franklin Street. The new similar application wasn't highlighted in the agenda materials or staff reports for the cannabis ordinance agenda items tonight but the fact that this application is back is certainly relevant to the discussions. In fact, it is even possible the new application is one of the primary reasons for these agenda items and their timing. Although these potential ordinance changes are in general and apply to all pending and future applications, the particular very controversial series of applications for this location should certainly be considered and acknowledged along with the other applications that were mentioned.

I am also troubled that none of the other participants for the earlier unsuccessful applications, including the neighbors, was provided special notice of these very important agenda items tonight but the applicant and other cannabis permit applicants were provided special notice of the agenda items. Does the City only want to hear from applicants and business owners or do you think it important to ensure that all affected parties are notified they might want to participate and have their voices heard?

Regards,

--Jacob

CITY OF FORT BRAGG
COMMUNITY DEVELOPMENT DEPARTMENT
 416 North Franklin Street
 Fort Bragg, CA 95437
 Tel: (707) 961-2827
 Fax: (707) 961-2802
 http://city.fortbragg.com

**RECEIVED**

OCT 20 2021

BY:

Case No(s)

Date Filed

Fee

Receipt No.

Received by

Office Use Only - June 2020

MUP 8-21 CBPS-21

PLANNING APPLICATION FORM

Please complete this application thoroughly and accurately, and attach the required exhibits as indicated in the applicable brochure available from the Community Development Department. Incomplete applications cannot be processed until they are complete. Please note that administrative permits may require additional fees if an interested party requests a public hearing. Public hearing expenses are borne by the applicant, owner, or agent.

APPLICANT

Name: Sunshine Holistic / Brandy Moulton
 Mailing Address: 18601 N HWY 1 #166 Phone: 707-223-1129
 City: Fort Bragg State: CA Zip Code: 95437 Email: brandy@sovereign707.com

PROPERTY OWNER

Name: Lyndia Pycott
 Mailing Address: 30600 HWY 20 Phone: 707-972-7724
 City: Fort Bragg State: CA Zip Code: 95437 Email: lyndiapycott@gmail.com

AGENT

Name: Same as applicant
 Mailing Address: _____ Phone: _____
 City: _____ State: _____ Zip Code: _____ Email: _____

STREET ADDRESS OF PROJECT 144 N Franklin St

ASSESSOR'S PARCEL NUMBER(S) 0081643900

PROPERTY SIZE _____ Square Feet or 0.35 Acres

TYPE OF APPLICATION (Check all applicable boxes)

- | | |
|--|--|
| <input type="checkbox"/> Design Review/Site & Architectural Review | <input type="checkbox"/> General Plan Amendment |
| <input checked="" type="checkbox"/> Use Permit/Minor Use Permit | <input type="checkbox"/> Local Coastal Program Amendment |
| <input type="checkbox"/> Coastal Development Permit | <input type="checkbox"/> Rezoning |
| <input type="checkbox"/> Variance/Administrative Variance | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> Lot Line Adjustment | <input type="checkbox"/> Pre-application Conference |
| <input type="checkbox"/> Subdivision (no. of parcels) _____ | <input type="checkbox"/> Limited Term Permit |
| <input type="checkbox"/> Certificate of Appropriateness (COA) | <input type="checkbox"/> Permit Amendment (list permits) _____ |
| <input type="checkbox"/> Planned Development Permit | <input type="checkbox"/> Fee Deferral |
| <input type="checkbox"/> Certificate of Compliance | |

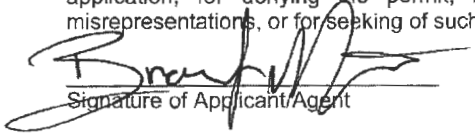
PROJECT DESCRIPTION

Briefly describe project as shown on proposed plans _____

Retail cannabis dispensary.

CERTIFICATION

I hereby certify that I have read this completed application and that, to the best of my knowledge, the information in this application and all attachments is complete and accurate. I understand that failure to provide requested information or misstatements submitted in support of the application shall be grounds for either refusing to accept the application, for denying the permit, for suspending or revoking a permit issued on the basis of such misrepresentations, or for seeking of such further relief as may seem proper to the City.


Signature of Applicant/Agent

10.12.21
Date

Discussed by:

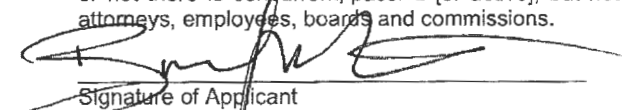
Signature of Property Owner

10/18/2021
Date

INDEMNIFICATION AND HOLD HARMLESS AGREEMENT

Ordinance No. 771, adopted by the Fort Bragg City Council on September 26, 1994, requires applicants for discretionary land use approvals to sign the following Indemnification Agreement. Failure to sign this agreement will result in the application being considered incomplete and withheld from further processing.

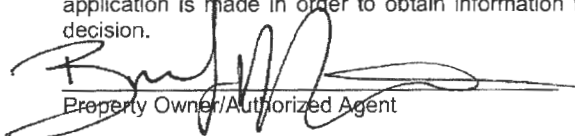
As part of this application, the applicant agrees to defend, indemnify, release and hold harmless the City of Fort Bragg, its agents, officers, attorneys, employees, boards and commissions, as more particularly set forth in Fort Bragg Municipal Code Chapters 17.70.060 and 18.70.060 from any claim, action or proceeding brought against any of the foregoing individuals or entities, the purpose of which is to attach, set aside, void or annul the approval of this application or adoption of the environmental document which accompanies it. The indemnification shall include, but not be limited to, damages, costs, expenses, attorneys fees, or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of this application, whether or not there is concurrent, passive (or active), but not sole, negligence on the part of the City, its agents, officers, attorneys, employees, boards and commissions.


Signature of Applicant

10.12.21
Date

SITE VIEW AUTHORIZATION

I hereby grant permission for City staff and hearing bodies to enter upon and site view the premises for which this application is made in order to obtain information necessary for the preparation of required reports and render its decision.


Property Owner/Authorized Agent

10.12.21
Date

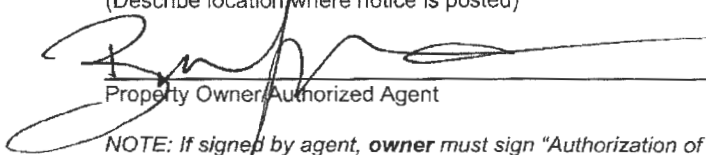
NOTE: If signed by agent, **owner** must sign "Authorization of Agent" below.

DECLARATION OF POSTING

At the time the application is submitted for filing, the applicant must complete and post the "Notice of Pending Permit" form at a conspicuous place, easily read by the public and as close as possible to the project site. If the applicant fails to post the completed notice form and sign the Declaration of Posting, the Community Development Department cannot process the application.

I hereby certify that I or my authorized representative posted the "Notice of Pending Permit" form in a conspicuous place, easily seen by the public and as close as possible to the project site for:

front window - next to front door.
(Describe location where notice is posted)

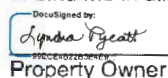

Property Owner/Authorized Agent

10.12.21
Date

NOTE: If signed by agent, **owner** must sign "Authorization of Agent" below.

AUTHORIZATION OF AGENT

I hereby authorize Brandy Moulton to act as my representative and to bind me in all matters concerning this application.

Discussed by:

Property Owner

10/18/2021
Date





NOTICE OF PENDING PERMIT

THE CITY OF FORT BRAGG IS PROCESSING AN APPLICATION
FOR DEVELOPMENT ON THIS SITE

PROPOSED DEVELOPMENT:

STREET ADDRESS: 144 N Franklin St

ASSESSOR PARCEL NUMBER(S): 0081643900

APPLICANT'S NAME: Sunshine Holistic / Brandy Moulton

DATE NOTICE POSTED: 10.14.21

For further information, please contact:

City of Fort Bragg

Community Development Department

416 North Franklin Street

Fort Bragg, CA 95437

Tel: 707-961-2827

NOTE: At the time an application is submitted for filing, the applicant must complete and post this notice in a conspicuous place, easily read by the public and as close as possible to the project site. A notice of the public hearing will be mailed 10 days prior to the public hearing to property owners within 300 feet of the project site and all other parties requesting notification.

CITY OF FORT BRAGG
 416 North Franklin Street
 Fort Bragg, CA 95437
 Tel: (707) 961-2827
 Fax: (707) 961-2802
<http://city.fortbragg.com>



RECEIVED	
OCT 20 2021	
Case No(s)	_____
Date Filed	_____
Fee	_____
Receipt No.	_____
Received by	_____
Office Use Only - August 2016	

CANNABIS BUSINESS PERMIT APPLICATION FORM

Please complete this application thoroughly and accurately as possible using the application checklist. Incomplete applications cannot be processed until they are complete. This application will be processed along with a City Business License and will remain pending until all required licenses and permits are approved. Public hearing expenses are borne by the applicant, owner, or agent.

APPLICANT

Name: Sunshine Holistic / Brandy Moulton
 Mailing Address: 18601 N Hwy 1 #166 Phone: 707 223 1129
 City: Fort Bragg State: CA Zip Code: 95437 Email: brandy@sovereign707.com

PROPERTY OWNER

Name: Lyndia Pycott
 Mailing Address: 30600 HWY 20 Phone: 707-972-7724
 City: Fort Bragg State: CA Zip Code: 95437 Email: _____

AGENT

Name: Same as applicant
 Mailing Address: _____ Phone: _____
 City: _____ State: _____ Zip Code: _____ Email: _____

STREET ADDRESS OF PROJECT 144 N Franklin St

ASSESSOR'S PARCEL NUMBER(S) 0081643900

PROPERTY SIZE _____ Square Feet or 0.35 Acres

TOTAL SQUARE FOOTAGE OF ALL STRUCTURES AND BUILDINGS TO BE USED BY THE APPLICANT: _____ Square Feet

PROPOSED HOURS OF OPERATION: 9am - 9pm

PROJECT DESCRIPTION

Briefly describe project as shown on proposed plans retail cannabis dispensary

TYPE OF CANNABIS BUSINESS ACTIVITIES TO BE CONDUCTED AT THE PROJECT ADDRESS

(Check all applicable boxes and indicate square footage of activity)

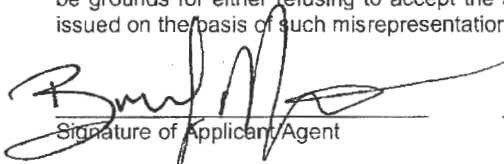
Type of Activity	CA State License Type/ Number	License Dates valid (MM/DD/YY – MM/DD/YY)	Total Sq. Footage for Use
PROCESSING			
MANUFACTURING Level 1 or 2 (circle)			
WHOLESALE/ DISTRIBUTION			
RETAIL	✓		1560 sf
RETAIL – DELIVERY ONLY			

Attach a copy of all current/pending licenses specific to the project site to this application.

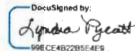
If required to register for California Cannabis Track-and-Trace System, have you done so? ☒ Yes ☐ No

CERTIFICATION

I hereby certify, under penalty of perjury that all the information contained in this application is true and correct. I understand that failure to provide requested information or misstatements submitted in support of the application shall be grounds for either refusing to accept the application, for denying the permit, for suspending or revoking a permit issued on the basis of such misrepresentations, or for seeking of such further relief as may seem proper to the City.


Signature of Applicant/Agent

10.12.21
Date

DocuSigned by:

1986CE4B22955A4E9

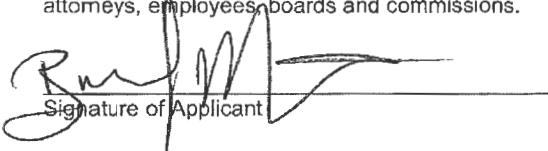
Signature of Property Owner

10/18/2021

Date

INDEMNIFICATION AND HOLD HARMLESS AGREEMENT

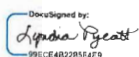
As part of this application, the applicant agrees to defend, indemnify, release and hold harmless the City of Fort Bragg, its agents, officers, attorneys, employees, boards and commissions, as more particularly set forth in Fort Bragg Municipal Code Chapters 17.70.060 and 18.70.060 from any claim, action or proceeding brought against any of the foregoing individuals or entities, the purpose of which is to attach, set aside, void or annul the approval of this application or adoption of the environmental document which accompanies it. The indemnification shall include, but not be limited to, damages, costs, expenses, attorneys fees, or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of this application, whether or not there is concurrent, passive [or active], but not sole, negligence on the part of the City, its agents, officers, attorneys, employees, boards and commissions.


Signature of Applicant

10.12.21
Date

SITE VIEW AND INVESTIGATION AUTHORIZATION

I hereby grant permission for City staff and hearing bodies to enter upon and site view the premises for which this application is made in order to obtain information necessary for the preparation of required reports and render its decision. Additionally, I grant permission for City staff and hearing bodies to seek verification of the information contained within the application.

DocuSigned by:

1986CE4B22955A4E9

Property Owner/Authorized Agent

10/18/2021

Date

NOTE: If signed by agent, owner must sign "Authorization of Agent" below.



**PUBLIC SAFETY REVIEW AUTHORIZATION**

I hereby grant permission for City of Fort Bragg to review the application and premises for which this application is made in order to obtain information necessary for the preparation of required reports and render its decision.


 Property Owner/Authorized Agent

10.12.21
 Date

NOTE: If signed by agent, **owner** must sign "Authorization of Agent" below.

DECLARATION OF POSTING

At the time the application is submitted for filing, the applicant must complete and post the "Notice of Pending Permit" form at a conspicuous place, easily read by the public and as close as possible to the project site. If the applicant fails to post the completed notice form and sign the Declaration of Posting, the Community Development Department cannot process the application.

I hereby certify that my authorized representative or I posted the "Notice of Pending Permit" form in a conspicuous place, easily seen by the public and as close as possible to the project site for:

front (west facing window)
 (Describe location where notice is posted)


 Property Owner/Authorized Agent

10.12.21
 Date

NOTE: If signed by agent, **owner** must sign "Authorization of Agent" below.

AUTHORIZATION OF AGENT

I hereby authorize Brandy Moulton to act as my representative and to bind me in all matters concerning this application.

Designated by:

 Property Owner

10/18/2021
 Date



CITY OF FORT BRAGG
COMMUNITY DEVELOPMENT DEPARTMENT
416 North Franklin Street
Fort Bragg, CA 95437
Tel: (707) 961-2827
Fax: (707) 961-2802
<http://city.fortbragg.com>

Cannabis Business Application Checklist

- ☒ City of Fort Bragg Cannabis Business Application, completed and signed
- ☒ Copy of all current/pending California State cannabis business licenses specific to the project site
- ☒ A list of the previous addresses for the past 5 years immediately prior to the present address of the applicant
- ☒ Copy of a valid California Drivers' License or Identification Card, US Passport, or birth certificate to verify the applicant is over 21 years of age.
- ☐ Photographs for identification purposes (will be taken at the Police Department)
- ☒ LiveScan and background check form for all management, employees, and anyone who will access non-public areas of the business
- ☒ A description of the applicant's prior cannabis business history, including whether the applicant, in previously operating in any city, county, or state under permit, has had a permit revoked or suspended and, if so, the reason therefor.
- ☒ All names of all persons having the management or supervision of the applicant's business
- ☒ Security plan ensuring the safety of employees and visitors from criminal activity, including theft and unauthorized entry;
- ☒ A sketch or diagram showing the interior configuration of the premises, including the area and proposed security of each room.
- ☒ A diagram illustrating the use and coverage of security cameras, security lighting, and necessary access restrictions; include public and non-public area designations
- ☒ Notarized statement by the property owner certifying under penalty of perjury that he or she has given consent to the applicant to operate a cannabis business at the location, or providing proof that the applicant owns the property.
- ☒ Operating procedures including the following:
 - o Product safety and quality assurance
 - o Record Keeping procedures
 - o Product recall procedures
 - o Solid waste disposal plan, with certification that waste transport entities and disposal facilities have agreed to haul and receive solid waste produced by the cannabis business
 - o Product supply chain information (cultivation, testing, transport, manufacturing, packaging, and labeling, etc.)
 - o Odor prevention plan which may include an odor absorbing ventilation and exhaust system or other measures to ensure the use does not produce odors which are disturbing to people of normal sensitivity
- ☐ If required, copy of CA Cannabis Track-and-Trace System Registration



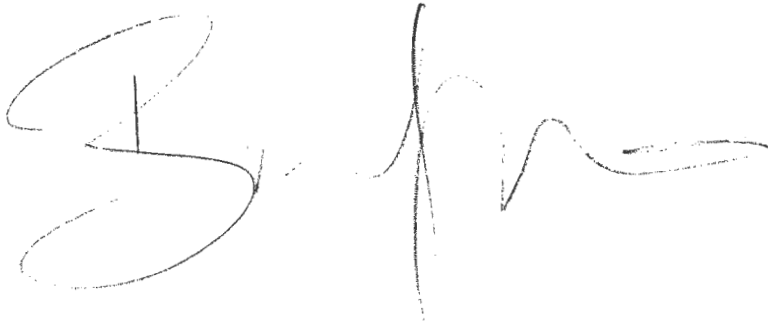
Brandy Moulton, CEO
Sunshine Holistic
18601 N HWY 1 PMB 166
Fort Bragg, CA 95437

Address History

Tenant turned Owner of 17501 Jade Court, Fort Bragg, CA 95437 (2012-current)

Commercial Tenant of 17555 E Kirtlan Way, Fort Bragg, CA (2016-current)
Landlord: John Kilgour: johnkilgour2002@yahoo.com

Residential Tenant of 33150 Church School Lane, Fort Bragg, CA 95437 (2017-current)
Landlord: Irene Romero: imromero@me.com

A handwritten signature in black ink, appearing to read 'Brandy Moulton', is written across the middle of the page.

Public Interest Exemption



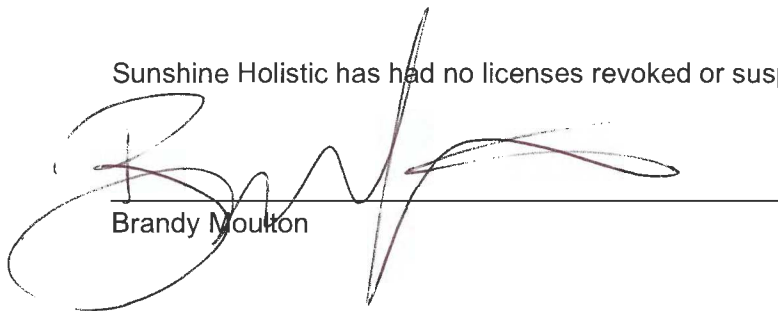
Sunshine Holistic

Cannabis Business History

Sunshine Holistic/Brandy Moulton owns and operates the following licenses:

- Retail: C10-0000271
- Distribution: C11-0000020
- Cultivation
 - CCL19-0004425
 - CCL19-0000839
 - CCL18-0003428
- Non-storefront retail: C9-0000130
- Microbusiness: C12-0000328

Sunshine Holistic has had no licenses revoked or suspended.



Brandy Moulton



REQUEST FOR LIVE SCAN SERVICE

BCII 8016 (3/07)

Applicant Submission**RECEIVED**

OCT 20 2021

Public Interest Exemption

Agency Address Set Contributing Agency:

Fort Bragg Police Department

Agency authorized to receive criminal history information

04867

Mail Code (five-digit code assigned by DOJ)

250 Cypress Street

Street No. Street or PO Box

Lesley Bryant

Contact Name (Mandatory for all school submissions)

Fort Bragg**CA****95437**

City

State

Zip Code

(707) 961-2800

Contact Telephone No.

Public Interest Exemption

Your Number: _____

OCA No. (Agency Identifying No.)

Level of Service: ☒ DOJ☒ FBIIf resubmission, list Original ATI
Number: _____

Employer: (Additional response for agencies specified by statute)

Employer Name _____

Street No. _____

Street or PO Box _____

Mail Code (five digit code assigned by DOJ) _____

City _____

State _____

Zip Code _____

()
Agency Telephone No. (optional) _____

Live Scan Transaction Completed By: _____

Name of Operator

3.19.2021
Date**Certifix (FN8)**

Transmitting Agency

F078M0B185

ATI No.

79.-

Amount Collected/Billed

Sunshine Holistic
18601 N HWY 1 PMB 166
Fort Bragg, CA 95437



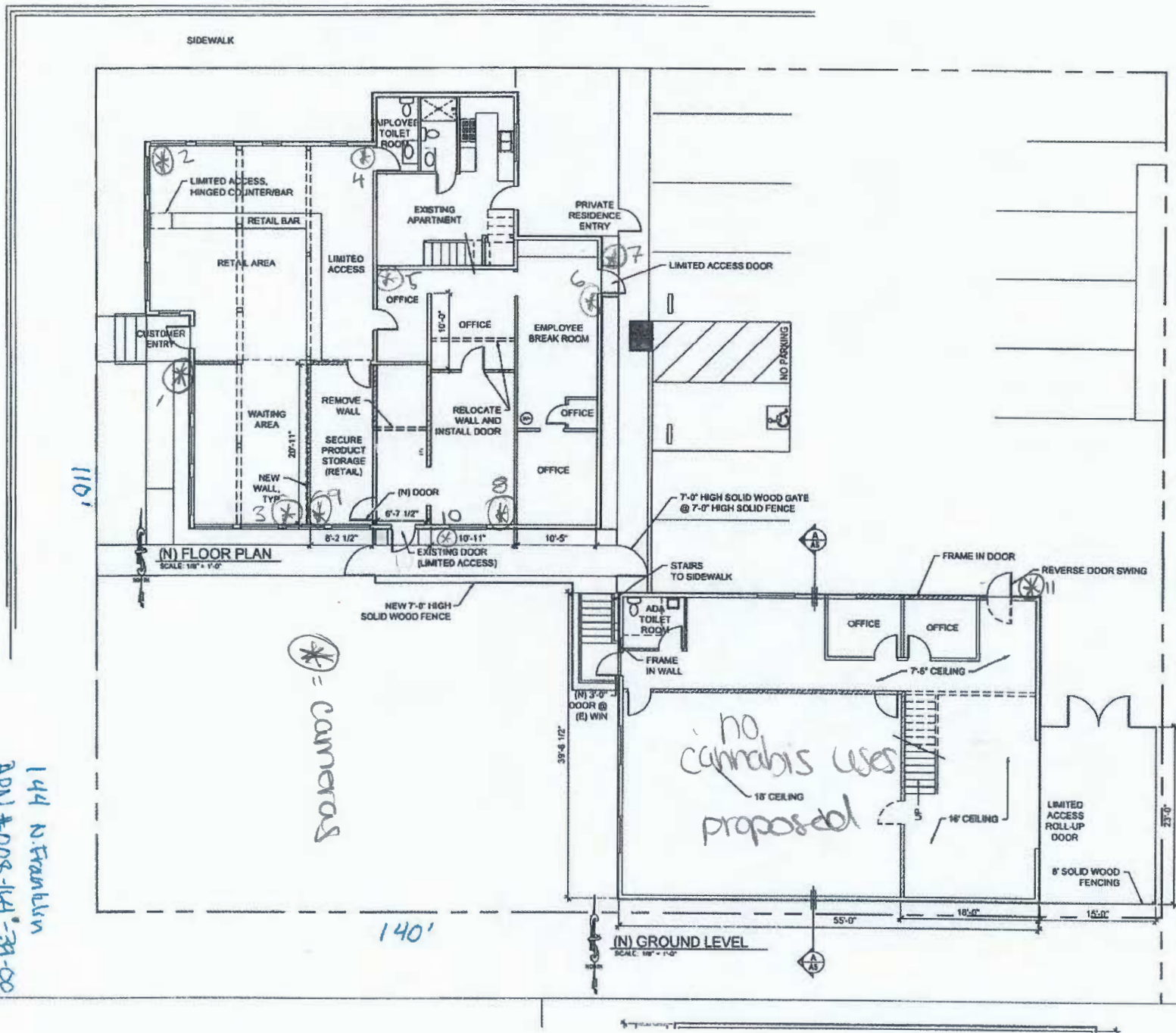
Security Plan

Public Interest Exemption

Miller St.

Alley

Franklin St.



RECEIVED
OCT 20 2021
BY:

↑
N

144 N. Franklin
APN #008-161-31-00
MAP 1-21
Sunshine Holistic Dispensary
Brandy Newton



CITY OF FORT BRAGG

Incorporated August 5, 1889
416 N. Franklin Street
Fort Bragg, CA 95437
Phone: (707) 961-2823
Fax: (707) 961-2802

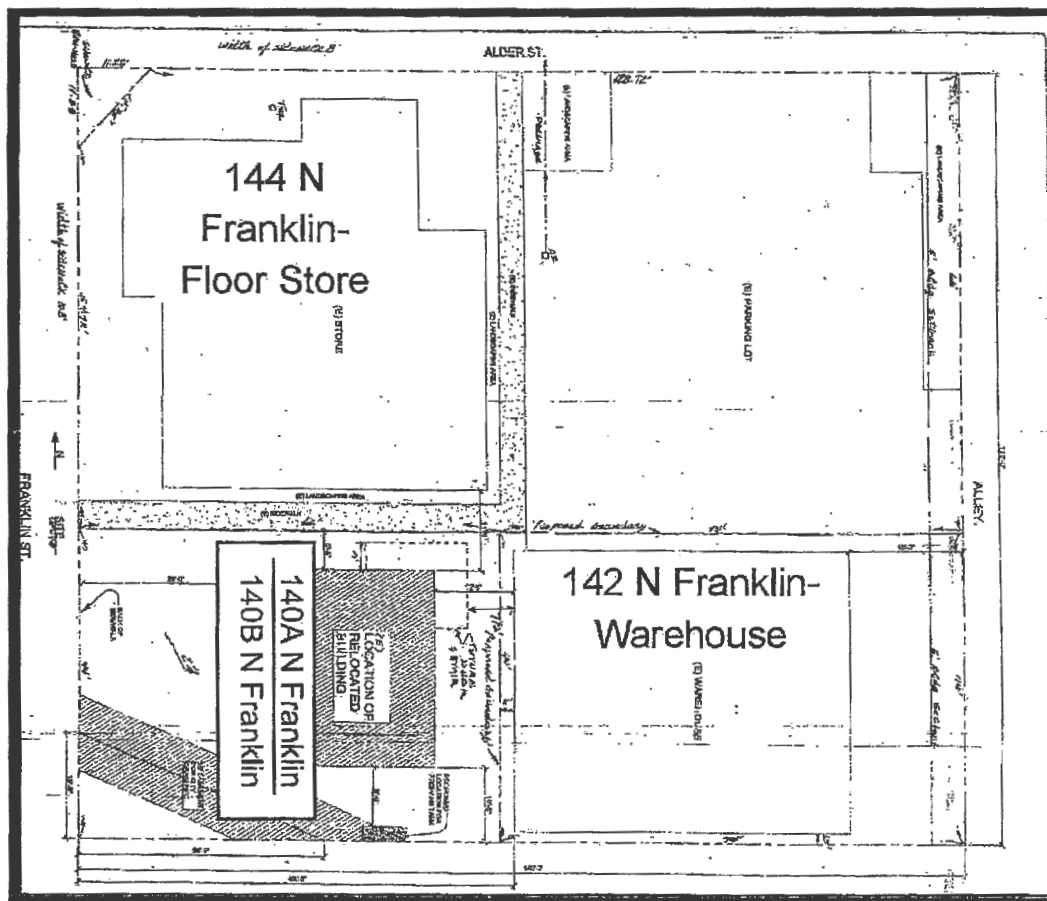


December 6, 2016

RE: ADDRESS ASSIGNMENT FOR ASSESSOR PARCEL NO. 008-164-39

This letter is written to assign addresses to the commercial structures located on the Fort Bragg parcel of property known as Assessor Parcel No. 008-164-39, currently known as 144 N Franklin St. The Community Development Department has assigned the following addresses:

Parcel 008-164-39	
Existing Structure	Address Assigned
Floor Store-144 N Franklin St.	144 N Franklin Street
Warehouse-on alley	142 N Franklin Street
Relocated Building-Top Floor	140 A N Franklin Street
Relocated Building- Ground Floor	140 B N Franklin Street



December 5th, 2019



To whom it may concern,

I, Lyndia Pyeatt, certify under penalty of perjury that I am the owner of the property located at 144 N Franklin St. Fort Bragg CA. parcel number 00816439.

I hereby give consent to Sunshine Holistic and all associated parties to engage in commercial cannabis operations as allowed by the city of Fort Bragg and the State of California.

Signed

Lyndia Pyeatt
Lyndia Pyeatt

12-11-2019
Date

ACKNOWLEDGMENT

RECEIVED

OCT 20 2021

BY:

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Mendocino

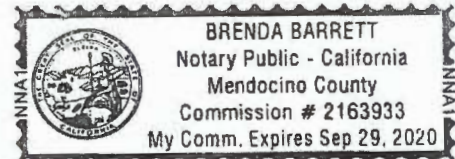
On Dec 11, 2019 before me, Brenda Barrett Notary Public
(insert name and title of the officer)

personally appeared Lyndia P. Pratt
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Brenda Barrett (Seal)



Cannabis Facility Application
Applicant: Sunshine Holistic
Address : 144 N Franklin St Fort Bragg, CA 95437
APN: 008-164-39
Building Size: 5600 square feet
Lot Size : 0.35 Acres



Proposed Use : Cannabis Retail facility

PROJECT NARRATIVE

SUMMARY

Sunshine Holistic proposes to operate a Commercial Cannabis Micro-business facility within the site at 144 N Franklin Rd in Fort Bragg. The entire facility is approximately 5000 square feet, and the division of space will be:

Retail Space will occupy approximately 1560 square feet, with large well-lit display cabinets.

Office, employee, and administration space will approximately occupy approximately 2000 square feet.

Vacant or overflow storage space will occupy 1439 square feet.

The proposed project will include activities permitted by a retail dispensary licensed for Medicinal & Adult use, which allows retail sales of cannabis and cannabis products to consumers, either at a brick-and-mortar dispensary or via delivery. The new dispensary planned for 144 N Franklin St will offer a unique combination of retail and delivery as customers will be able to shop in store and then have the products delivered on a daily, weekly or monthly basis. Sunshine Holistic will work diligently to provide unmatched service to each person that walks through their doors and ensure that a sense of community is built within their customer base and neighborhood.

LOCATION REQUIREMENT

Distance to sensitive sites

Sunshine Holistic complies with all applicable provisions of the Zoning Code and the City Code. Sunshine Holistic is not located within 600 feet of a school. "School" means any public or private school providing instruction in kindergarten or grades 1 to 12.

Storefront Entrance

Storefront entrance will be in a visible location with an unobstructed view from the public right of way

EMPLOYEE REGISTER

Sunshine Holistic will maintain employee files on site, whether in physical form or digital.

Required by law to report the following:

Employers:

California employer payroll tax account number

Federal employer identification number

Business name and address

Contact person and phone number

Employees:

First name, middle initial, and last name.

Social Security number

Livescan

Start-of-work date



RECORDKEEPING

Sunshine Holistic has a record-keeping plan in place to maintain, update, and store records related to its operations. The record-keeping plan will allow Sunshine Holistic to comply with the City of Fort Bragg audits and inspections.

Sunshine Holistic will monitor and track inventory. Inventory will be monitored with a real-time, web-based inventory control system, which will track information for each piece of inventory from seed to sale or disposal.

The general manager will implement and strictly oversee the real-time, web-based inventory control system, which will be accessible by the City of Fort Bragg during business hours, seven days per week, unless an emergency is identified. This system will keep meticulous track of every bit of cannabis onsite until the product is either purchased or Sunshine Holistic disposes of it. All cannabis will be entered into the inventory system immediately with all identifying information. This includes the registration number of the agent making the entry, date/time, quantity, strain, and batch number.

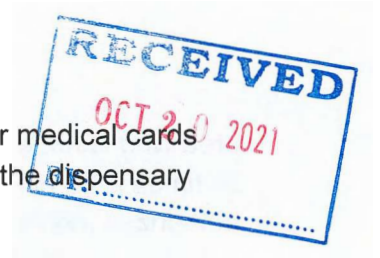
ACCESS PROTOCOL

Public Interest Exemption

PURCHASES AND DENIALS OF SALES

Purchases will be recorded in Sunshine Holistic's inventory tracking system. The system will document the date a Dispensing Associate makes a sale of medical cannabis or MCIP, how much product was sold, the strain, the identity of the patient, and which Associate sold the product. Associates will also document in the event a patient is denied the sale of medical cannabis. Documentation will include the date of the denial, the identity of the patient, the Associate who denied the sale, and the reason for the denial. Sunshine Holistic anticipates

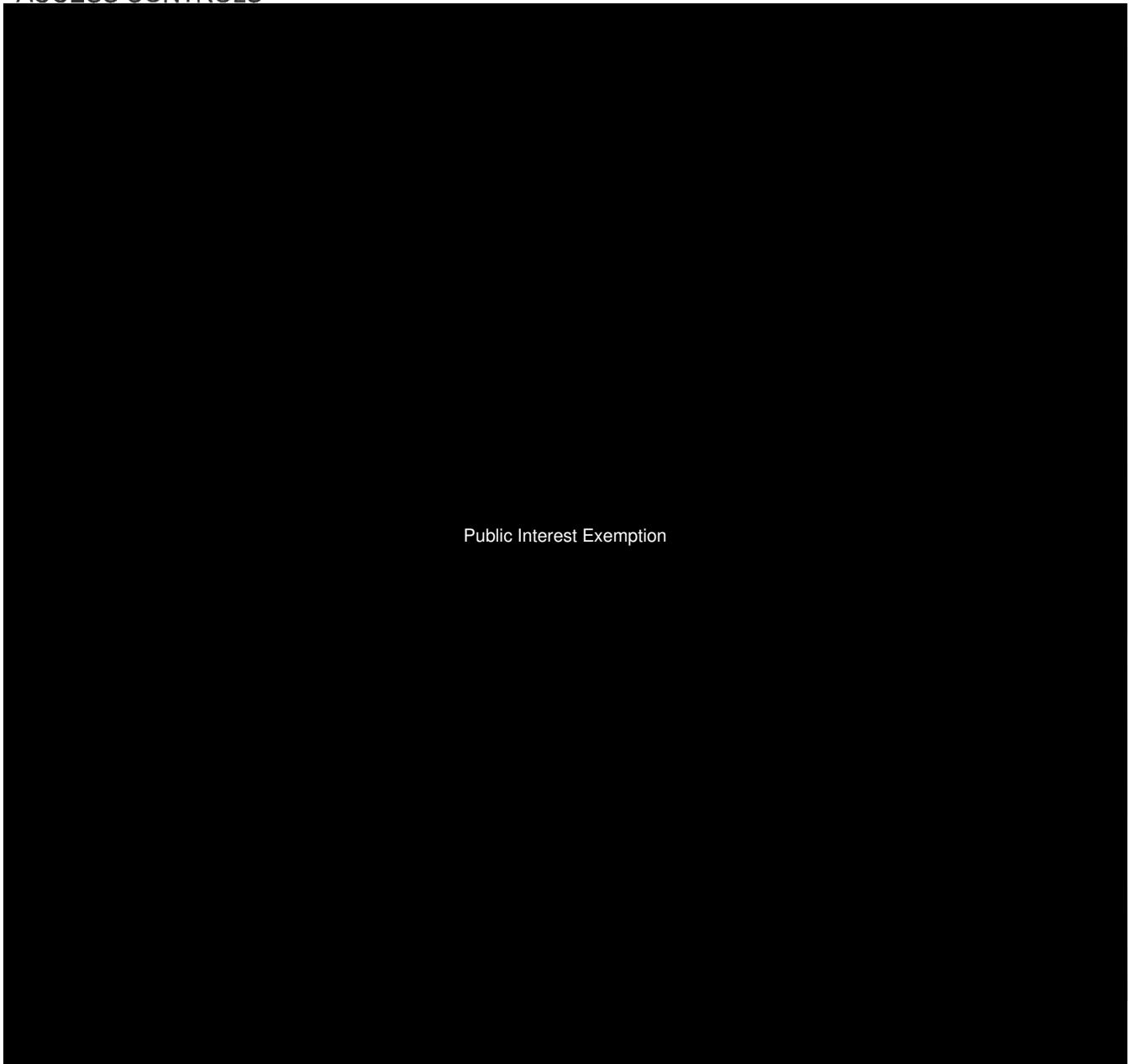
that denials will typically occur when the product requested is not available or medical cards are deemed expired. The manager will review denials of sale to confirm that the dispensary has an adequate supply to meet patient requests.



CONFIDENTIALITY

Sunshine Holistic's associates will be trained to meet California state regulations and HIPAA requirements regarding patient confidentiality. Sunshine Holistic's inventory information and all other records are subject to strict confidentiality requirements. Upon employment, associates are required to complete training and to sign a non-disclosure agreement. Associates who violate confidentiality or allow unqualified persons to view records will be terminated immediately.

ACCESS CONTROLS



Public Interest Exemption

Public Interest Exemption

SECURITY SURVEILLANCE SYSTEM

Public Interest Exemption

ELECTRONIC SECURITY SYSTEM

Public Interest Exemption

Public Interest Exemption



FAILURE NOTIFICATION SYSTEM

Public Interest Exemption

ELECTRICAL BACKUP SYSTEMS

Sunshine Holistic will use a battery with sufficient power to supply a minimum of twenty (20) minutes of backup power to video cameras, alarms, sensors, panic buttons and computers in the event of a total power outage. This power backup system will deter theft or diversion by individuals who want to create or take advantage of a power outage.

SURVEILLANCE RECORDING ACCESS CONTROLS

Public Interest Exemption

STATE LICENSE

A copy of issued State License will be displayed per state regulations.

DELIVERY

Sunshine Holistic plans to deliver Cannabis and Cannabis Products to patients located outside the Cannabis Retail facility in Mendocino County pursuant to Cal. Code Regs. Tit. 16 § 5415. All deliveries of cannabis goods will be performed by a delivery employee (over the age of 21) of a retailer in a new model hybrid vehicle, as to minimize noise and pollution from delivery operations. All deliveries of cannabis goods shall be made in between the operating hours of 9am-9pm and will not be made using an unmanned vehicle. Employees delivering cannabis will carry a copy of the retailer's current license, the employee's government-issued identification, and an identification badge provided by the employer and maintain an accurate list of the retailer's delivery employees. Delivery will only be offered to a physical address in California, not to an address located on publicly owned land or any address on land or in a building leased by a public agency. Delivery employees, carrying cannabis goods for delivery, shall only travel in an enclosed motor vehicle operated by a delivery employee of the licensee and ensure the cannabis goods are not visible to the public.

RECEIVED

OCT 21 2021

BY:

The vehicle(s) used for the delivery of cannabis goods will be outfitted with a dedicated Global Positioning System (GPS) device for identifying the geographic location of the delivery vehicle. The device shall be either permanently or temporarily affixed to the delivery vehicle and shall remain active and inside of the delivery vehicle at all times during delivery. At all times, the retailer shall be able to identify the geographic location of all delivery vehicles that are making deliveries for the retailer and shall provide that information to the Bureau upon request. Upon request, the retailer will provide the California Cannabis Control Bureau with information regarding any motor vehicles used for the delivery of cannabis goods, while making deliveries, Sunshine Holistic's delivery employee shall not carry cannabis goods worth in excess of \$3,000 at any time. This value shall be determined using the current retail price of all cannabis goods. All pertinent info will be recorded including the vehicle's make, model, color, Vehicle Identification Number, license plate number and Department of Motor Vehicles registration.

The delivery service will have a menu available on their website and customers can either place their orders over the phone or online if they are already and established customer of theirs. In order to set up a delivery they will require a photo or scan of the customers Government issued ID be sent to us prior to the ordering process. The customer will send over all necessary information and will have a profile created within the point of sale system. The order will go into the system and be pulled by an employee at the retail facility. Once the order is filled it will be placed in an exit bag with a receipt affixed to the bag. The receipt will include, the name of the customer, their assigned ID number, delivery address, description of the cannabis items, total amount paid by the customer including all taxes, name and address of the facility making the delivery, the name and id number of the employee making the delivery, and the name and id number of the employee who prepared the delivery. The driver will retain an additional copy of the receipt to be signed by the customer upon receipt of the delivery. There will be space provided to have the date and time written in of when the delivery was made.

While Making deliveries of cannabis goods, Sunshine Holistic's employees shall only travel from the licensed premises to the delivery address; from one delivery address to another delivery address; or from a delivery address back to Sunshine Holistic's licensed premises. Sunshine Holistic's delivery employee will not deviate from the delivery paths described in this section, except for necessary rest, fuel, or vehicle repair stops, or because road conditions make continued use of the route unsafe, impossible, or impracticable.

ON-SITE CONSUMPTION:

No On-site Consumption activities proposed at this time.

SPECIAL EVENTS:

Special events will not be held on-site.

SITE MANAGEMENT PLAN/OPERATOR QUALIFICATIONS

CEO, CFO, COO Brandy Moulton:

Military Veteran,

Prior EMT and Paramedic certification,

Accounting experience,
Holds 9 State Issued Cannabis Facilities Licenses,
Proprietary Patrol Operator certified
Valid Guard card
10 years of Cannabis experience.

SECURITY PLAN



Public Interest Exemption

SURVEILLANCE

Public Interest Exemption

ALARM SYSTEM

Public Interest Exemption

ACCESS CONTROLS

Public Interest Exemption

INVENTORY CONTROLS

Sunshine Holistic will at all times operate in a manner to prevent diversion of Cannabis and shall promptly comply with any track and trace program established by the state to ensure that no diversion or loss occurs. In the event of any inventory discrepancies, Sunshine Holistic will immediately notify regulators and law enforcement within the required time periods. In addition, Sunshine Holistic will perform a reconciliation of its inventory at least once every 14 days and shall be made available to the California Cannabis Bureau upon request.

In addition, Sunshine Holistic proposes to maintain an accurate record of sale for every sale made to a customer and include the information required. Sunshine Holistic will only display cannabis goods for inspection and sale in the retail area, and not be visible from outside the licensed premises. Sunshine Holistic will not make any cannabis goods available for sale or delivery to a customer unless: The cannabis goods were received from a licensed distributor, the retailer has verified that the cannabis goods have not exceeded their expiration or sell-by date if one is provided; and In the case of manufactured cannabis products, the product complies with all requirements of Business and Professions Code section 26130 and all other relevant laws.

Sunshine Holistic will operate according to CAL. CODE REGS. tit. 16 § 5408, and only sell, only live, immature cannabis that are not flowering, and purchased from a nursery that holds a valid Type-4 license under the Act, and a label is affixed to the plant or package containing any seeds which states "This product has not been tested pursuant to Medicinal and Adult-Use Cannabis Regulation and Safety Act." Sunshine Holistic will also strictly follow the daily limits pursuant to (CAL. CODE REGS. tit. 16 § 5409).

STORAGE AND WASTE

Solid waste will be separated into Compost, Recycling and Household Waste. A representative from Waste Management has confirmed that waste produced by this cannabis facility will be accepted in the weekly collection routes. All hazardous materials will be stored on site and transported to a hazardous materials collection event. All cannabis products and any cannabis waste will be stored in an area secured with commercial-grade non-residential locks, that is not visible to the public and that prevents diversion, theft, loss, hazards and nuisance. All storage and handling of hazardous materials will occur in code compliant control areas. All vendors will be pre-scheduled in advance and must present valid identification. Vendors will only be granted access to the areas required for removal of waste. All waste removal vendors will be required to document and track all waste materials removed from the Site.

TRAINING AND RECORDS

Management will require that employees follow necessary procedures to ensure that cannabis and any related by-products from the project site are not visible or accessible to the



public. Every employee will be required to participate in training to learn Sunshine Holistic's security and safety protocols required for continuous employment. Sunshine Holistic will mandate that all employees be well versed in all security procedures and provide the means to obtain a Guard Card from the Bureau of Security and Investigative Services. As required by state rules, Sunshine Holistic will maintain up-to-date and current records related to the cannabis operation. Those records will be stored in a secure manner onsite and will include surveillance vendor contracts with schematics of the security zones, name of vendors and monitoring company, and a list of all currently authorized employees with access to the surveillance and/or alarm systems. All surveillance equipment, records and recordings will be stored in a secure area that is only accessible to Applicant's management. Finally, Sunshine Holistic will update the security plan to comply with any new local or state laws and regulations for cannabis licensing.

ODOR

Sunshine Holistic shall incorporate and maintain adequate odor control measures such that the odors of Cannabis cannot be detected from outside of the structure in which the Business operates. Operational processes and maintenance plan, including activities undertaken to ensure the odor mitigation system will be kept up to date and functional. This will include staff training procedures and engineering controls, which may include carbon filtration or other methods of air cleansing, and evidence that such controls are sufficient to effectively mitigate odors from all odor sources. All odor mitigation systems and plans submitted pursuant to this subsection shall be consistent with accepted and best available industry-specific technologies designed to effectively mitigate cannabis odors.

LIGHTING

Interior and exterior lighting shall utilize best management practices and technologies for reducing glare, light pollution, and light trespass onto adjacent properties and the following standards.

Exterior lighting systems shall be provided for security purposes in a manner sufficient to provide illumination and clear visibility to all outdoor areas of the premises, including all points of ingress and egress. Exterior lighting shall be stationary, fully shielded, directed away from adjacent properties and public rights of way, and of an intensity compatible with the neighborhood. All exterior lighting shall be Building Code compliant and comply with Section 20-30.080 (Outdoor Lighting.)

Interior light systems shall be fully shielded, including adequate coverings on windows, to confine light and glare to the interior of the structure.

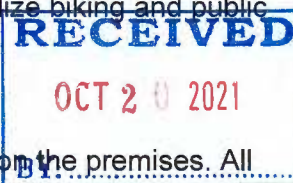
NOISE

Use of air conditioning and ventilation equipment shall comply with the Noise regulations of the City of Fort Bragg.

PARKING

The proposed project has 6 dedicated parking spaces, including one ADA space. The current parking stalls provided are consistent with the City's requirements. Parking areas will be

regularly monitored by staff for safety and security. Employee shifts will be staggered to accommodate onsite parking, and employees will be encouraged to utilize biking and public transportation options.



MINORS

Sunshine Holistic will not allow any person who is under the age of 18 on the premises. All guests and visitors will be required to present identification for security and age determination Purposes.

OPERATIONAL PLAN

HOURS OF OPERATION

Storefront - Retail operations shall be open to the public between 9am and 9pm seven days a week.

Delivery - All deliveries within the City of Fort Bragg shall be done between 9am and 9pm.

STAFFING PLAN

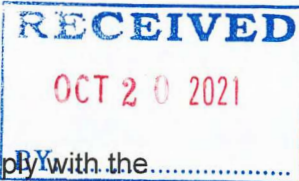
All staff will receive thorough training on workplace safety, operations, track and trace, and security protocols. In addition to state licensing requirements related to staffing, Sunshine Holistic will diligently follow all applicable labor and employment laws. The employees will likely be full time and will work staggered shifts to accommodate customer flows. All employees hired by Sunshine Holistic will be over 21 years of age. Sunshine Holistic is committed to hiring employees locally. Mendocino County and Fort Bragg have a wealth of experienced and dedicated cannabis workforce. Sunshine Holistic plans to consider residency when making hiring decisions, will promote the job posting locally, and will use local connections in the cannabis industry to discover new local talent.

REGULATORY LAWS AND PROCEDURES

Sunshine Holistic will follow Cal. Code Regs. tit. 16 § 5410 & 5411 pertaining to allowing returns of purchased cannabis and giving away free under certain restrictions. Applicant will package or label cannabis goods and not accept, possess or sell cannabis goods that are not packaged as they will be sold at final sale. Cannabis goods purchased at applicants site by a customer shall not leave the retailer's premises unless goods are placed in an opaque exit package. Applicants will not have on-site or on-staff physicians to evaluate patients and provide a recommendation for Cannabis; the goods are placed in an opaque exit package. Applicants will not have on-site or on-staff physicians to evaluate patients and provide a recommendation for Cannabis packages. Applicants will not have on-site or on-staff physicians to evaluate patients and provide a recommendation for Cannabis. Applicant will not have on-site or on-staff physicians to evaluate patients and provide a recommendation for Cannabis. In addition to the retail operations established in this section, the consumption of Cannabis and Cannabis Products on-site shall not be permitted by patients or customers.

DUAL STATE LICENSING

Sunshine Holistic, prior to occupancy, will apply for and receive a Micro-business license from



the Bureau of Cannabis Control. Additionally, all software and staff training to comply with the Track and Trace system regulated by the California Department of Food and Agriculture will be implemented with ongoing training occurring to ensure up to date knowledge of the staff.

NEIGHBORHOOD COMPATIBILITY

The location provides an ideal setting for this type of land-use. This project will feature an understated storefront with no advertising that will ensure neighborhood integration and minimize disruptions. Pursuant to Health and Safety Code Section 11362.768 and the site is set back over 600 feet from any K-12 school, or other Cannabis retail operation. This site is discrete yet has plenty of square foot and dedicated parking to service customers without creating an impact on other business or traffic flow in the neighborhood.

The proposed facility is well-suited to house dispensary operations. The building will be upgraded where necessary to meet ADA compliance standards for persons with disabilities. The existing entrance is visible and there is no existing landscape or adjacent structure that would impact visibility, lighting, or security requirements.

NEIGHBORHOOD ENHANCEMENT

Sunshine Holistic will maintain the exterior building, replacing any damaged physical features of the building and keeping up with paint schedules. We will also maintain the existing rose bushes and incorporate more green, indigenous plants to the allotted garden space around the building. Employees will be allotted time every day to patrol the perimeter of the building and remove any waste that may have been dropped from all sidewalks, parking lots and streets, public and private. The use of remote monitored security cameras and the on site security guard provides a safer environment for all businesses, residents and consumers that may be in the area. The business is projected to create an additional 10 jobs at above minimum wage for our community. Sunshine Holistic will provide training to the projected employees at no cost to the individual. This is supported by the existing business model, no employee is paid less than 15 dollars an hour, all security and retail training is paid for by Sunshine Holistic.

COVID-19 Addendum

Accommodations will be made to ensure the safety of our employees and consumers. Personal protective equipment will be provided and required at all times, 6 foot diameter between employees will be provided. Sunshine Holistic will comply with any and all laws put forth by the City of Fort Bragg and the State of California.

Redaction Log

Reason	Page (# of occurrences)	Description
Public Interest Exemption	10 (1)	Portions of the attached record are exempt from disclosure and are redacted pursuant to Government Code Section 6255(a). This determination is made by the City's Custodian of Records.
	12 (2)	
	13 (1)	
	19 (1)	
	20 (1)	
	21 (3)	
	22 (3)	
	24 (4)	
	25 (1)	