BELLMAWR BOROUGH

21 East Browning Road
Bellmawr, New Jersey 08031
856-931-7284

JOINT LAND USE BOARD
LAND DEVELOPMENT APPLICATION

Please complete all sections of the application form and submit all items required by the ***Land Development Checklist*** for your application. If you are requesting a waiver for any item(s), the request must be in writing and include written documentation in support of your waiver request(s). Any application that does not have all items submitted, or a waiver requested, will be deemed incomplete.

DO NOT PUBLISH PUBLIC NOTICE OR MAIL NOTICE TO THE OWNERS OF PROPERTIES WITHIN 200 FEET UNTIL YOU HAVE RECEIVED THE DATE ASSIGNED FOR THE PUBLIC HEARING FROM THE BOARD SECRETARY. ALL APPLICATION DOCUMENTS AND FEES MUST BE RECEIVED BY THE BOARD SECRETARY A MINIMUM OF 30 DAYS PRIOR TO A SCHEDULED HEARING. ONCE THE APPLICATION IS DEEMED COMPLETE IT WILL BE SCHEDULED FOR THE NEXT AVAILABLE HEARING.

THIS SECTION TO BE COMPLETED BY BOROUGH STAFF:

Date Filed: ____________________ Application Number: ____________________

Date Deemed Complete: ____________________ Application Fee: ____________________

Date of Public Hearing: ____________________ Escrow Fees: ____________________

THE FOLLOWING TO BE COMPLETED BY THE APPLICANT AND HIS PROFESSIONALS:

Applicant(s)	Owner(s)
Name: CGT New Jersey LLC	Name: Sun Sun AAA LLC
Address: 518 N. 129th Infantry Drive	Address: 134-38 Maple Avenue
City Joliet	City: Flushing
State, Zip IL 60435	State, Zip NY 11355
Phone: 403-992-9676	Phone:
Email: Jason@vencanna@com	Email: jessyzheng10000@gmail.com

Applicant is a: ☒ Corporation ☐ Partnership ☐ Individual

If applicant is a corporation or partnership, attach a list of the names and addressed of all stockholders or individual partners owning at least 10% of its stock of any class or at least 10% of the interest in the partnership, as the case may be per N.J.S.A. 40:55D-48.1. * Please see attached sheet

APPLICANTS DISCLOSURE STATEMENT

Pursuant to the New Jersey Municipal Land Use Law, N.J.S.A. 40:55D-48.1 and 48.2, a corporation, partnership or other business entity that makes application for a subdivision of land into six or more lots, or site plan approval for commercial purposes, or a variance to construct a multiple dwelling of 25 or more family units, must disclose the name(s} and address(es} of all persons, stockholders, or individual partners owning at least 10% of the stock in the corporation or at least 10% of the interest in the partnership or other entity.

The names and addresses of all persons, stockholders, or individual partners owning at least ten percent (10%) interest in the corporation, partnership, or applicant are as follows:

NAME	ADDRESS
Marcus Godfrey	518 N. 129th Infantry Drive, Joliet IL 60435
Jason Ewasuik	216 Woodside Bay, SW Calgary,
	Alberta, Canada T2W 3K8

June 21, 2023
DATE

APPLICANTS SIGNATURE

CGT New Jersey LLC
APPLICANT (PRINT FULL NAME)

TYPE OF APPLICATION (Check as many as apply):

☐ Minor Subdivision ☐ Preliminary Major Subdivision ☐ Final Major Subdivision

☐ Minor Site Plan ☐ Preliminary Major Site Plan ☐ Final Major Site Plan

☒ Site Plan Waiver ☒ Bulk 'C' Variance Review ☐ Use 'D' Variance Review

☒ Other Conditional use

ZONING DISTRICT:

☐ Residence 'A' ☐ Residence 'B'

☐ Business 'A' ☐ Business 'B' ☐ Business 'C'

☐ Office ☒ Light Industrial ☐ Heavy Industrial

☐ Municipal Government & Ed ☐ Recreation-Open Space ☐ Limited Access Highway

SUBJECT PROPERTY:

Block(s): 67 Lot(s): 6, 6.02 & 6.03 Tax Map page: 14

Property Address: 143 Harding Avenue

Existing Land Use: Office/commercial building

Proposed Land Use: Applicant proposes a Class 5 cannabis retailer at this site

SITE INFORMATION:

Does the site front on a county road? ☐ Yes ☒ No Route # ______

Does the site front on a state road? ☒ Yes ☐ No Route # 42 (no access)

Is the Site within 200 feet of another municipality? ☐ Yes ☒ No Name: ______

Bulk Standards

	Existing	Proposed
Lot Size (Square Feet)	45,614.45 SF	No change
Lot Width	260 FT	260 FT
Front Yard Setback:	40.6 FT	No change
Side Yard Setback:	Left 1.7 FT; Right 104.3 FT	No change
Rear Yard Setback:	Rt 42: 5.3 FT	No change

Building Coverage (%)	16,125 sf – 35.35%	No change
Impervious (Occupied) Coverage (%)	26,178 – 57.39%	No change
Building Height	2 Story building	No change

Restrictions, covenants, easements, association by-laws, existing or proposed on the property:

Yes (attach copies) ________ No ___X___ Proposed ________

***Note: Copies of All deed restrictions, covenants, easements, association by-laws, existing and proposed must be submitted for review (a Title Search or Easements and Restrictions Search)**

RELIEF REQUESTED (Variances, Conditional Use, Etc):

Borough Code:	Explanation of Variance Request:
* Please see variance list	* Please see variance list

Give a complete description of any requested variances and the reasons for relief. What are the EXCEPTIONAL conditions of the property preventing the applicant from complying with the Zoning Ordinance(s) (i.e. the positive and negative criteria. For conditional uses, state the ways in which your project satisfies the requirements of the conditional uses.

1. * Please see variance list

2. ____________________

3. ____________________

Explain in detail the exact nature of the application and the changes to be made at the premises, including the proposed use of premises (attach additional pages as needed):

Applicant proposes a Class 5 cannabis retailer at this site

Present use of the premises: Office/commercial building

Proposed use: Applicant proposes a Class 5 cannabis retailer at this site

APPLICANT'S PROFESSIONALS:

Name: Danielle Kinback, Esquire	Name: John W. Kornick, PE, PP
Company: Prime & Tuvel, LLC	Company: K2 Consulting Engineers, Inc.
Address: 14000 Horizon Way, Suite 325	Address: 36 Tanner Street, Suite 100
City Mount Laurel	City: Haddonfield
State, Zip NJ, 08054	State, Zip NJ, 08033
Phone: 856-273-8300	Phone: 856-310-5205
Email: dkinback@primelaw.com	Email: jkornick@K2CE.com

* Please see bottom of page for additional professional

SIGNATURES:

I hereby consent to the filing of this application and consent to allowing Borough representatives to perform on site visits. (Both signatures are required.)

CGT New Jersey LLC	[signature]	June 21, 2023
Applicant (Print Name)	Signature	Date
Sun Sun AAA LLC		
Owner (Print Name)	Signature	Date

* **Traffic Engineer:** Andrew Feranda, PE, PTOE, CME for Shropshire Associates LLC
277 White Horse Pike, Suite 203, Atco, NJ 08004
(609) 714 0400 aferanda@sallc.org

Present use of the premises: Office/commercial building

Proposed use: Applicant proposes a Class 5 cannabis retailer at this site

APPLICANT'S PROFESSIONALS:

Name: Danielle Kinback, Esquire	Name: John W. Kornick, PE, PP
Company: Prime & Tuvel, LLC	Company: K2 Consulting Engineers, Inc.
Address: 14000 Horizon Way, Suite 325	Address: 36 Tanner Street, Suite 100
City Mount Laurel	City: Haddonfield
State, Zip NJ, 08054	State, Zip NJ, 08033
Phone: 856-273-8300	Phone: 856-310-5205
Email: dkinback@primelaw.com	Email: jkornick@K2CE.com

* Please see bottom of page for additional professional

SIGNATURES:

I hereby consent to the filing of this application and consent to allowing Borough representatives to perform on site visits. (Both signatures are required.)

CGT New Jersey LLC		
Applicant (Print Name)	Signature	Date
Sun Sun AAA LLC		
Owner (Print Name)	Signature	Date

* **Traffic Engineer:** Andrew Feranda, PE, PTOE, CME for Shropshire Associates LLC
277 White Horse Pike, Suite 203, Atco, NJ 08004
(609) 714 0400 aferanda@sallc.org

Borough of Bellmawr Land Development Checklist

Name of Applicant: CGT New Jersey LLC **Application #:**____________

Submission Item Number and Description		Site Plan			Subdivision			Bulk Variance Only	Waiver Requested	Submitted
		Minor	Preliminary Major	Final Major	Minor	Preliminary Major	Final Major			
1.	Completed signed Application form, checklist, and escrow agreement (14 copies)	X	X	X	X	X	X	X		X
2.	Fourteen (14) sets of plans and exhibits folded with title block showing	X	X	X	X	X	X	X		X
3.	Application Fee and Escrow Deposit Paid	X	X	X	X	X	X	X		X
4.	Affidavit of Ownership; if the applicant is not the owner, applicant's interest in the land, e.g., tenant, contract purchaser, lien holder, etc., and a copy of the document creating that interest (price may be deleted), Consent of owner.	X	X	X	X	X	X	X		X
5.	If a corporation or partnership, list the names and addresses of all stockholders or individual partners owning at least ten (10%) of its stock of any class as required by N.J.S.A. 40:55d-48.1	X	X	X	X	X	X	X		X
6.	The names and addresses of witnesses and their expertise, if any (attach to app).	X	X	X	X	X	X	X		X
7.	List of outside agency approvals required and copies of applications to/approvals from outside agencies with jurisdiction (Camden County Planning Board, Camden County Health Dept., NJDEP (wetlands, stream encroachment, NJPDES), NJDOT, Soil Conservation District, etc)	X	X	X	X	X	X			X
8.	The plat/plan shall be prepared under the supervision of and be signed and sealed by a licensed New Jersey land surveyor, professional planner, professional engineer or registered architect in accordance with the provisions of N.J.A.C.13:40-7.1, et seq.	X	X	X	X	X	X			X

9.	The map/plan shall include: • Name and address of the owner and applicant • Name and address of the person preparing the plan with license #, seal and signature • Signature block for Chairman, Land Use Board Secretary, and Engineer • Signature of the applicant and land owner • Date of the original plan and revision dates • Legend/ Title block including title, block and lot, tax map sheet, zone district, address, name of the development, municipality and county, plan scale	X	X	X	X	X	X			
10.	Current or re-certified property survey prepared and sealed by a registered NJ Land surveyor (prepared or certified within the last 1 year) with source and date, showing all existing structures and features.	X	X	X	X	X	X			
11.	Certification and monumentation required by Map Filing law.	X	X	X	X	X	X			
12.	Metes and bounds bearings and dimensions, curve data, length of tangents, radii, arcs, chords and central angles for all lots, center lines and rights-of-way, utility easements and centerline curves on streets and drive aisles, with design vehicles identified.	X	X	X	X	X	X			
13.	Certification from the Tax Collector that all taxes are paid to date.	X	X	X	X	X	X	X		X
14.	Narrative statement providing an overview of the proposed uses of the land and improvements, alterations, or additions (page 4 of application)	X	X	X	X	X	X	X		X

Borough of Bellmawr Land Development Checklist

15.	A list of each item for which waiver is sought, together with a statement of reasons why waivers should be granted.	X	X	X	X	X	X			NA
16.	A list of variances sought, and a statement of the reasons why the variances should be granted (pg 3 and 5 of application).	X	X	X	X	X	X	X		N/A
17.	Location key map showing the entire tract, location of existing and proposed property/street lines, entire subdivision/site plan and its relation to surrounding area and all features shown on the Official Map & located within 200 feet of the limits of the subject tract.	X	X	X	X	X	X			
18.	A key map, at an appropriate scale, with a north arrow showing the location of the site with zone boundaries and municipal boundaries.	X	X	X	X	X	X			
19.	Plans should be prepared at a minimum scale of one (1) inch equals forty (40) feet. If the property is of a larger size then the scale may be prepared at a maximum of one (1) inch equals one hundred (100) feet.	X	X	X	X	X	X			
20.	North designation by arrow on each sheet.	X	X	X	X	X	X			
21.	Date reference meridian and graphic scale	X	X	X	X	X	X			
22.	The Tax Map sheet, block and lot numbers as per the Assessor's records	X	X	X	X	X	X			
23.	Proposed street names and new block/lot numbers approved by the tax assessor and the emergency services department.				X	X	X			
24.	The names of all property owners within 200 feet, as disclosed by the most recent tax records with block and lot. (within 6 months)	X (not needed if no variances)	X	X	X	X	X			

25.	A schedule of mandated and provided zoning district requirements, including total acreage, lot area, lot width, lot depth, yard setbacks for structures and pavement, building coverage and square footage, lot coverage, open space area, density and parking. Setback lines on plan	X	X	X	X	X	X	X		
26.	Anticipated number of residents or number of employees.	X	X	X	X	X	X			
27.	Proposed phasing and construction schedule for entire project.		X	X		X	X			
28.	For a General Development Plan, all items listed in NJSA 40:55D-45.1 and 45.2								X	
29.	An environmental impact statement. In accordance with §208-132	X	X	X		X	X		X	
30.	A Phase I Environmental Assessment report conforming to current ASTM standards including soil testing results if required.		X			X			X	
31.	Traffic impact study addressing the impact of the proposed development on existing roadways. [See §208-133]		X	X		X	X			
32.	The names and widths of all abutting streets and driveways, including the right-of-way and cartway (pavement width).	X	X	X	X	X	X			
33.	Copy of any protective covenants or deed restrictions that apply to the subject parcel	X	X	X	X	X	X		X	
34.	Drafts of proposed protective covenants, deed restrictions, HOA documents or easements for review by the Land Use Board and its professional staff	X		X	X		X		X	
35.	Photographs of the site taken from the opposite side of the street, and to show any notable physical aspects of the site that may be instructive.	X	X		X	X		X		X
36.	All proposed lot lines with metes and bounds, lot lines to be eliminated, area of proposed and existing lots in square feet	X	X	X	X	X	X		X	

37.	The location, design and dimensions of each proposed and existing structure and wooded area on the property and within 200 feet.	X (within 50 feet for minor)	X	X	X (within 50 feet for minor)	X	X			
38.	A description of the method by which sanitary sewerage will be disposed.	X	X	X	X	X	X			
39.	The existing and proposed use of all buildings and structures including bridges, culverts, paving, lighting, signs and grade elevations for each structure.	X	X	X	X	X	X			
40.	Vehicle Circulation. The location, dimensions and arrangement of existing and proposed streets, vehicular access ways and driveways, curb openings, turn radii, off-street parking areas, location, dimensions and arrangement of loading and unloading areas	X	X	X		X	X			
41.	Calculation of required number of parking spaces and total number of parking spaces provided.	X	X	X		X	X			
42	Existing or proposed rights-of-way, road widening and easements with dimensions; and all land to be dedicated to the municipality or reserved for specific uses.		X	X	X	X	X			
43	Landscape Buffers in accordance with the Design Standards	X	X	X	X	X	X			
44.	Landscape plan and buffering plan as required, including what vegetation will remain and what will be planted (common and botanical name), quantities, size at time of planting, dimensions, method of planting, and corner sight distance triangles	X	X	X	X	X	X			
45.	Distance along rights-of-way lines of existing streets to the nearest intersection with other streets	X	X	X	X	X	X			
46.	The location, design and dimensions of open space areas, conservation areas, buffer areas, pedestrian walkways and any recreation areas and facilities proposed.		X	X		X	X			

47.	Method by which common/public open space or commonly held building or structure is to be owned and maintained.		X			X				
48.	Any structures of historic significance on or within two hundred (200) feet of the tract, and if applicable a statement of the impact of the development on the historic structure.	X	X		X	X				
49.	Contours at 5 foot intervals for the entire tract and within 100 feet (USGS Topographic maps are sufficient) and conformance with the grading plan requirements prior to the issuance of any building permits.	X	X	X	X	X	X			
50.	A grading plan showing existing and proposed spot elevations, based upon the datum, at all building corners, all floor levels, center lines of abutting roads, top and bottom curbs, property corners, gutters and other pertinent locations sufficient to assure that the project will not have an adverse affect on the existing drainage pattern.	X	X	X	X (request waiver if no constructi on or grading is proposed- will be a condition)	X	X			
51.	Soil Erosion and Sediment Control Plan consistent with the requirements of the soil conservation district.	X	X	X	X	X	X			
52.	Location of and results of the soil borings and soil testing indicating the depth to groundwater, seasonal high groundwater, and soil permeability rates within each stormwater management facility area.	X	X	X	X	X	X			
53.	The location, size and direction of flow of all streams, brooks, ditches, lakes and ponds with Floodplain boundaries.	X	X	X	X	X	X			
54.	An analysis of the condition of the nearest downstream drainage structure substantiating its capacity and integrity.		X	X		X	X			
55	Location of the existing and proposed 100 year floodplain within or adjacent to the proposed development and method of establishment.	X	X	X	X	X	X			

56.	Cross sections and center-line profiles of all existing or proposed streets or water courses with dimensions at 50 foot intervals.		X	X		X	X			
57.	Stormwater Control Plan and Drainage Calculations in accordance with Ordinance 393.	X	X	X		X	X			
58.	Preliminary plans and profiles of proposed utility layouts and connections to existing or proposed utility systems and water and sewer facilities.		X	X		X	X			
59.	Floor plan and front elevation of all proposed principal buildings and contemplated accessory buildings and structures, and any side or rear elevations in public view consistent with the design standards for the zone.	X	X	X		X	X			
60.	Gross floor area per building, floor area ratio (FAR) and square footage allocation of uses per building.	X	X	X		X	X			
61.	Lighting plan showing the location, height, light distribution, design and distance from intersections of for all freestanding lights, street lights, building mounted lights, sign lighting and ground lighting in accordance with Borough standards.	X	X	X		X	X			
62.	Location, size and materials of containers and enclosures for solid waste and recycling, and a detail of same.	X	X	X		X	X			
63.	If lots proposed for subdivision or development have frontage on or require access to a State Highway, submit copies of any permits issued by NJDOT pursuant to NJAC 16:47-1 et. seq.	X	X	X	X	X	X			
64.	Metes and bounds monumentation of wetlands line and wetlands buffer line.	X	X	X	X	X	X			

Borough of Bellmawr Land Development Checklist

65.	A letter of interpretation from the New Jersey Department of Environmental Protection either verifying the locations of the freshwater wetlands boundary and transition areas on the subject property, or determining and certifying that the proposal is exempt from the provisions of the Fresh Water Wetlands Protection Act, or confirming the absence of freshwater wetlands or freshwater wetlands transition areas on the subject property. Wetlands line and buffer must be shown on plans.	**X**	**X**	**X**	**X**	**X**	**X**			
66.	Lots consisting of both wetlands and uplands are to show the total lot area and the area of the uplands exclusive of the wetland buffers.	**X**	**X**		**X**	**X**				
67.	Utilities. Preliminary plans and profiles of proposed scale of not more than one (1) inch equals fifty (50) feet horizontally and one(1) inch equals five (5) feet vertically showing connections to existing and proposed utility systems including water, sewer, electric, gas and cable. Include design calculations.	**X**	**X**	**X**		**X**	**X**			
68.	Size, type, copy and location of all proposed signs	**X**	**X**	**X**			**X**			
69	Where there is potential future development of adjacent parcels or undeveloped portions of the subject lot, locations of future pedestrian and vehicular connections.		**X**	**X**		**X**	**X**			
70.	Municipal Developer Agreement between the developer and the municipality for redevelopment, general development plan or other subdivision or site plan where off tract improvements are contemplated.		**X**	**X**			**X**			
71.	Barrier free sub code requirements if applicable	**X**	**X**	**X**		**X**	**X**			
72.	Traffic control and directional signage plan (elevation, size, color, etc)	**X**	**X**	**X**		**X**	**X**			

73.	Construction details required by RSIS (NJAC 5:21), including cross section details of all drainage systems and details for roads, sidewalks, stormwater management systems, fire hydrants, water supply and sewer systems.		**X**	**X**		**X**	**X**			
74.	Letter containing a list of all items to be covered by a performance guarantee, with quantities and cost of each item and the total cost of all items			**X**			**X**			

TYPES OF APPLICATIONS

Minor Site Plan: An application that proposes minor site improvements that does not involve planned development, more than 500 sf of building addition, additional off street parking, or utility main extensions and has land disturbance of greater than 500 sf but less than 2,000 sf.

Major Site Plan: Any Site Plan application that is not classified as a Minor Site Plan.

Minor Subdivision: An application for the subdivision of land containing not more than three (3) lots fronting on an existing minor street, not involving any new street or road or the extension of municipal facilities.

Major Subdivision: Any Subdivision application that is not classified as a Minor Subdivision.

Bulk Variance Only: An application that involves no more than two (2) bulk variances and land disturbance of 500 sf or less.

Addendum to Joint Land Use Board Application for CGT New Jersey LLC

Checklist Item #6 – List of Witnesses

Attorney
Duncan M. Prime, Esquire or Danielle N. Kinback, Esquire
Prime & Tuvel, LLC
14000 Horizon Way, Mount Laurel, NJ 08054

Applicant
Jason Ewasuik, Managing Member
CGT New Jersey LLC
216 Woodside Bay, SW Calgary, Alberta Canada, T2W 3K8

Engineering Testimony
John W. Kornick, PE, PP
K2 Consulting Engineers, Inc.
36 Tanner St., #100, Haddonfield, NJ 08033

Checklist Item #7 – List of Outside Agency Approvals Required

Camden County Planning Board

Checklist Item #38 – method by which sanitary sewerage will be disposed

Sanitary sewer will be disposed via the existing sanitary sewer line.

Joint Land Use Board Application for CGT New Jersey LLC

<u>Statement of Compliance with Conditional Use Standards Pursuant to Code §260-60.1(B)</u>

§ 260-60.1 Cannabis Establishment as Conditionally Permitted Use Overlay Zone.

B. Conditional use. ... Conditions of operation for cannabis establishments:

(1) All cannabis establishments Class 1 through 6, located with the Borough shall meet all requirements for licensure and hold the appropriate license issued by the Cannabis Regulatory Commission, Department of Treasury, State of New Jersey.

A copy of Applicant's CRC License has been provided.

(2) No cannabis establishment shall permit on-site consumption of cannabis or cannabis-related products including no on-site sales and consumption of alcohol or tobacco products.

On-site consumption of cannabis or cannabis-related products and sale and consumption of alcohol or tobacco products will be prohibited.

(3) No outside storage of any cannabis, cannabis products or cannabis-related materials shall be permitted.

Outside storage of any cannabis, cannabis products or cannabis-related materials is not proposed and will be prohibited.

(4) Hours of operation of any cannabis retail facility shall be limited from 8:00 a.m. to 7:00 p.m., seven days a week.

Hours of operation will be limited to from 8:00 a.m. to 7:00 p.m., seven days a week.

(5) For each cannabis establishment located within the Borough a security plan to be approved by Bellmawr Police Department shall be provided to demonstrate how the facility will maintain effective security and control of the operations. The plan should include the following but not limited to:

(a) Type of security systems to be installed.

(b) Installation, operation and maintenance of security camera coverings all interior and exterior parking lots, loading areas and other such areas of the establishments.

(c) Tracking and record keeping of products and materials.

(d) Type of lighting provided in and around the establishments.

(e) Location on site security team and armed guard on premises.

A security plan has been provided with the Application

C. Conditions of performance standards.

(1) All cannabis establishments, particularly Class 1, 2, 3, 4 and 5, shall provide detail information on odor control from these sites. This shall include air treatment systems with sufficient odor absorbing ventilation and exhaust systems such that any odors generated inside the facility are not detectable are not detectable by a person of reasonable sensitivity anywhere on adjacent property, within public rights of way, or within any other unit located in the same building if the use occupies a portion of a building.

A statement on odor control has been provided as part of the Application.

(2) All cannabis establishments shall provide for noise mitigation features designed to minimize disturbance from machinery, processing and or packaging operations, loading and other noise generating equipment or machinery. All licensed facilities must operate within applicable state decibel requirements.

This statement is not applicable to the Application as only retail is proposed and no packaging or processing shall take place at the Property. Applicant will provide testimony at hearing.

(3) Loitering, disruption to/and or obstruction of the free passage of persons or vehicles in immediate vicinity of the property shall be considered unlawful.

Testimony to be provided at hearing regarding prevention of Loitering, disruption to/and or obstruction of the free passage of persons or vehicles in immediate vicinity of the property.

D. Conditions of site development standards.

(1) All cannabis establishment operations such cultivation, manufacturing, wholesale packaging, retail, and laboratories shall be conducted within a building. No operations shall be conducted outside.

All operations will be conducting within a building and no operations will be conducted outside.

(2) Class 1, Class 2, Class 3 and Class 4 shall have minimum lot area of 2.5 acres.

Not Applicable, Applicant proposes Class 5 business.

(3) No cannabis establishments shall be located within 200 feet of a residential zone, house of worship, school, or day care.

The Property is not within 200 feet of a residential zone, house of worship, school or day care.

(4) Other than the minimum lot area requirements for Class 1, Class 2, Class 3 and Class 4 cannabis operations as required under this section, all lot and bulk regulations shall comply with §260-67.

Not Applicable, Applicant proposes Class 5 business.

(5) Parking: Each cannabis establishment shall comply with the following parking schedule which shall be used to calculate the required number of off-street parking spaces per use. Where the calculation results in a fraction of a space, the required number of parking spaces shall be rounded to the nearest whole number.

> ...
>
> *(e) Cannabis retailer: one per every 250 square feet of gross floor area.*
>
> **Applicant is providing 60+ spaces for 4,150 square feet of gross floor area and complies with this provision.**
>
> ...

(6) Landscaping shall comply with § 260-58.

(7) Utilities shall comply with § 260-59.

(8) Except for the required number of off-street parking spaces, which is prescribed under this section, all off-street parking and loading shall comply with Article XVI.

(9) Signage shall comply with Article XVII.

(10) Fences, hedges and walls shall comply with Article XVIII.

(11) All development in this overlay zone is subject to building design and site plan review per Article XXI.

(12) Performance standards shall comply with Article XX

The Property subject to the Application is a previously developed site currently in operation. Applicant will comply to the extent practicable. Additional testimony to be provided at hearing.

<u>Proof Cannabis Establishment Will Be Operated</u>
<u>Pursuant to All Local and State Regulations</u>

As an applicant whose members have substantial cannabis industry experience, we are very familiar with managing compliance programs in highly regulated markets across the country. Our Compliance Team will ensure that every aspect and function within our retail facility complies with the CREAMM Act (the "Act'), the rules promulgated thereto, and with all local regulations. Below we have provided details demonstrating our experience complying with medical and recreational programs in similar markets, a description of our Quality Assurance/Quality Control Plan, a brief description of our Standard Operating Procedures ("SOPs") for handling adverse events, complaints, and recalls, and a general overview of our plan to comply with all remaining regulatory requirements. We are excited to bring our expertise to Bellmawr and look forward to working with the Borough and with the NJ CRC to make sure that we consistently produce high quality, safe, and effective products.

1. **A Wealth of Experience in Cannabis Regulatory Compliance**

Our Regulatory Compliance Plan ("RCP") was devised in consultation with a former Head Cultivation Agent for Cresco Labs, one of the largest vertically integrated multi-state cannabis operators in the U.S. Indeed, our consultant worked at one of Cresco's top facilities – it's 45,000 square foot indoor R&D cultivation facility in Kankakee, Illinois where he led a team of 8 that was responsible for all critical stages of cultivation from germination to harvest, including: the transplant and grow environment for clones; monitoring all environmental controls (water, airflow, CO2, temperature, lighting, and humidity); the supervision and mixing of nutrients and pesticides; maintaining proper PH and EC levels; ensuring proper watering throughout the grow cycle; and ongoing maintenance and cleaning of cultivation equipment. In addition to supervising day-to-day operations, he was also responsible for improving cannabis production and harvest quality through the use of varying new techniques and strains, including the development of SOPs for grow cycle and yield optimization, as well as for the minimization of pesticide use. Furthermore, our RCP, including but not limited to, our SOPs related to retail dispensary operations, were also devised in consultation with WHL Plant LLC (whlplant.com), a leading cannabis consultation firm that specializes in retail operations and regulatory compliance. Indeed, WHL Plant's founder and president, Andrea Trobradovic not only has experience as the Director of Retail Operations for multiple cannabis multi-state operators, including managing 18 dispensary locations at one time, but WHL Plant is also contracted with the State of New York as one of ten design-build firms tasked with designing and building out the first 150 social equity dispensaries in that state. As part of that process, Andrea is also working directly with the state to help streamline dispensary operations.

2. **A Robust Quality Plan**

Our plan to maintain regulatory compliance is also based on the development of a comprehensive Quality Plan aimed at ensuring that our customers receive high quality, safe and effective products achieved through strict adherence to written policies and procedures modeled after pharmaceutical standards. We take a quality systems approach to quality assurance and quality control in that we firmly believe that the only way to ensure regulatory compliance is to not rely on testing alone but rather to build quality and safety into every aspect of our operations. Described below is our plan to staff our facility with highly skilled compliance leaders and to train all facility personnel on our compliance procedures and processes.

a. Compliance Personnel

Our Compliance Team will be led by industry veterans with compliance experience to ensure quality systems are implemented according to industry best practices. Initial management-level positions will include a Director of Compliance, General Counsel, and subordinate compliance employees to manage all compliance functions. We have provided brief descriptions for relevant compliance roles below.

General Counsel: The General Counsel will report directly to the COO. The General Counsel's primary responsibility will be to advise the executive team on legal matters, including changes in the regulatory or statutory frameworks, pending litigation, providing contract review and oversight, and advising the executive team on any other legal matters pertaining to the business. Additionally, the General Counsel will assist the Director of Compliance with high-level compliance-related issues.

Director of Compliance: The Director of Compliance will report directly to the Chief Operating Officer. The Director of Compliance will be primarily responsible for implementing our compliance program, ensuring that operations employees are adequately trained on compliance issues, implementing Standard Operating Procedures (NJAC 17:30-7.10(b)(20)), conducting internal audits and preparing audit reports for senior management, and overseeing the inventory tracking system, managing a team of compliance associates and the Inventory Control Manager, and overseeing all aspects of compliance training for facility staff.

Compliance Associate: The Compliance Associate will report directly to the Director of Compliance. The Compliance Associate will assist the Director with daily functions, including assisting with the implementation of SOPs, conducting audits and generating audits reports, monitoring the inventory tracking system and alerting the Director and Senior Management to functionality and inventory issues. The Compliance Associate will conduct other activities as required by the Director of Compliance.

Inventory Control Manager: The Inventory Control Manager (ICM) will report directly to the Director of compliance and will be in charge of maintaining all inventory reports, conducting internal audits in collaboration with other managers, and ensuring that all inventory reports are accurate and uploaded to our Electronic Tracking System. The ICM will conduct daily inventory audits at the beginning and close of business, report discrepancies directly to both the COO and the Director of Compliance and will be in charge of managing discrepancy reports and internal discrepancy procedures. Additionally, the ICM will conduct random product packaging and label audits to ensure products meet regulatory and internal standards.

b. Compliance Hierarchy and Flow

Maintaining exemplary regulatory compliance protocols requires a proper hierarchy and a well-trained compliance staff. Based on industry best-practices, we have formulated the following organizational chart:

c. Description of Employee Training

While our Director of Compliance will be the primary employee in-charge of ensuring that our facility is compliant with State rules and regulations, our system of compliance is built into the fabric of our workforce. Our quality systems approach to compliance requires that every employee involved in our dispensing operations have the education, training, and experience to enable them to perform all of their assigned functions in a fully compliant manner. It also requires that all dispensing employees receive continued training to remain proficient in their operational functions and in their understanding federal guidelines, as well as in all State rules and regulations. Our General Manager, in collaboration with our Director of Compliance, is responsible for defining the appropriate qualifications for each position. As described below, there will be three primary areas of training:

1. Commission Required Training: Our Director of Compliance is responsible for providing compliance training which addresses, among other topics: History of cannabis use, prohibition, and legalization; Common cultivation techniques and strain/cultivar varieties; Chemotypes of cannabis; Packaging, labeling, and advertising; Cultivation and manufacturing processes; Health education regarding the risks of cannabis use and over-use, including cannabis dependency; the medical use of cannabis; and Laws and rules pertaining to cannabis, including the Act. 17:30-8.1(b)(2).
2. Standard Operating Procedures Training: Additional training will be provided related to our SOPs for: adverse event reporting; quality assurance and quality control; recall protocols; packaging and labeling; inventory control, storage, diversion prevention; recordkeeping; waste disposal/sanitation; cultivation, manufacturing, retail sale, delivery, secure transport, as applicable, depending on the employee function; accounting and tax

compliance; and the reporting of test results. 17:30-7.8(a)(11).

3. Federal Guidelines Training: Finally, each employee will receive training related to the policies, procedures, and written instructions related to: our Quality Plan; and how specific job functions relate to quality control and quality assurance.. We provide all new employees with OSHA training completed directly by a third-party OSHA-certified trainer (a Division of Occupational Safety and Health (DOSH) or Cal/OSHA trainer). As part of this training, all employees are encouraged to exercise their rights under OSHA, including filing an OSHA complaint, participating in an inspection, and reporting injuries or health hazards.

We maintain records of any training provided to our employees for the performance of their assigned duties. These records are reviewed by our Compliance Director and General Counsel to ensure that all retail employees are receiving and/or completing the training required for them to perform all functions assigned to them. These records will be stored for a minimum of five years and will be made available to the Commission upon request.

3. Complaints/Adverse Events/Recalls

Our Company strives to minimize, and ideally eliminate, defects in our products or packaging from ever leaving our facility. Nevertheless, recognizing that mistakes are inevitable and that some mistakes may present a threat to health and safety, we maintain a fulsome recall policy. We will consistently train our employees on recall procedures and maintain a Recall Committee so that we will be prepared if and when a recall is necessary. Our primary goal for our recall policy is to protect public health by rapidly removing products from the supply chain that have been determined to be unsafe. A related goal is to identify root causes and revise current practices and procedures to eliminate the problem(s) that lead to the recall.

We will initiate a recall upon notification from the Commission that a recall is required. We will also initiate a recall when we become aware of concerns meriting a recall, providing prior notice to the Commission. For purposes of our notifications to the Commission, we recognize three levels of recalls: (1) a Class I Recall in which there is a reasonable probability that the use of, or exposure to, one of our products or an error in labeling will cause serious adverse health consequences or death (mandatory); (2) a Class II Recall in which use of, or exposure to, one of our products or labeling may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote (mandatory); and (3) a Class III Recall in which use of, or exposure to, a defective product or label is not likely to cause adverse health consequences (voluntary). The scope of the recall will extend to each product affected or potentially affected by the problem giving rise to the recall.

The recall process moves through the following steps: (1) Initial notification to the Commission; (2) Evaluation of the safety concern to determine if it is a cause for recall and, if so, the level and scope of the recall; (3) Determination of the serial numbers of the products in which the safety concern is or may be present; (4) Impoundment of all potentially affected products that remain in our custody or which are in transit to our dispensary; (5) Assistance to the cultivators, manufacturers and other licensed entities and government regulators to provide notice to all consumers who have purchased a potentially affected product; (6) Recapture to the greatest extent possible of potentially affected products; and (8) Disposition of the recalled products by correction, if appropriate, or destruction. Each of these steps may be an ongoing process as more information is developed and further analysis conducted. The fact that a step is ongoing is not a reason to delay proceeding to the other steps.

To ensure rapid execution of the recall process should there ever be a need for a recall, our Recall Policy sets forth specific roles that employees will play in the recall process and the roles are pre-assigned so that each employee knows his/her role. The President or his/her designee, serves as the Recall Coordinator. The Coordinator is involved whenever the Company becomes aware of information indicating that there is a defect in a product or labelling which has left the facility. There is also a standing Recall Committee that will consist of multiple high-level employees within our organization and/or officers and directors, and will include the following persons, as well as any other internal personnel or outside retained experts as may be designated by the Recall Coordinator: (1) the Recall Coordinator; (2) the Director of Compliance; (3) the Inventory Control Manager; (4) the Director of Security and Anti-Diversion; and (5) the Chief Operating Officer.

All employees are required to review the recall policy at least annually. Employees who are assigned specific roles in the recall plan will be required to review the recall policy at least semi-annually and to be familiar with the execution of the plan. In addition, all employees will be advised of the identity of the Recall Coordinator at least annually, as well as anytime a new Recall Coordinator is appointed. The Recall Committee members review the procedure every twelve months. The procedure will also be reviewed after any recall. Our retail team will conduct a mock recall exercise within three months of commencing operations and on an annual basis thereafter. The Recall Coordinator will document the mock recall in a Recall Report and the Recall Committee will review the mock recall process and correct and improve our Recall Plan where appropriate.

Determining Whether to Initiate a Recall, Level and Scope: Information indicating the need for a recall can come from many sources. These include, without limitation: (1) complaints from consumers and/or prescribing physicians; (2) notification from the Commission, other regulators and other public sources such as a hospital or poison control hotline; (3) internal reports (like our Deviation Report) from our employees of a problem or concern; and (4) licensed cultivators and manufacturers. Whenever our organization receives information or a notice of any of the above, that information is immediately provided to our Recall Coordinator.

The Recall Coordinator will record the report in a database of all such notices including: name and contact information of the reporter, the nature of the problem reported, any illness or injury experienced in connection with the problem, the product or products identified by the reporter, and the purchase date (if applicable). The Recall Coordinator will immediately establish contact with the Commission to advise of the report and of the further steps that the Company will be taking. The Recall Coordinator will discuss any potential recall issues with knowledgeable staff for initial evaluation, including the Directors of Compliance. At any point in the recall evaluation or execution process, the Recall Coordinator may also retain the services of outside experts to advise him/her.

If the initial assessment indicates that a product or product packaging/labeling in the distribution chain may be defective, out of tolerances, violative of any applicable regulation or law, or may present any threat to health or safety, then the Recall Coordinator will assemble the Recall Committee for a full evaluation. The Recall Coordinator will make the decision and has full authority to decide to initiate a recall and determine the level and scope of the recall. The Recall Committee cannot overrule the Recall Coordinator's decision to initiate a recall nor can it reduce the level and scope of the recall. However, in the event that the Recall Coordinator decides not to issue a recall, the Recall Committee will vote whether to overrule that decision. A simple majority vote is all that is required. Likewise, the Committee may vote, by simple majority to expand the level or scope of the recall. In the event that a simple majority vote to initiate a recall is not achieved, the Compliance Director can determine that a recall is necessary. In the event that this occurs, as with the Recall Coordinator, the decision cannot be overruled. The final decision of the Recall Coordinator and/or Recall Committee is reported to the Commission which will have the ultimate say on the level and scope of the Company's recall. Immediately upon the decision to initiate a recall, the Recall Coordinator will advise the Commission of the decision and the reasons therefore. The Recall Coordinator will proceed to create a Recalled Products List identifying all products within the scope of recall. The List shall identity separately each product within the scope of recall, listing the registered name and product identifier number, date(s) of harvest, the date range of sales, batch number(s) and serial number range of the affected packages. The Recall Coordinator will ensure that we follow all directions from the Commission.

4. Plan to Comply with New Jersey Rules and Regulations

Our Compliance Team will ensure that we comply with all applicable New Jersey laws and regulations. In the section that follows, we have provided an overview of our plan for regulatory compliance related to the most pertinent regulations.

a. Cannabis Business Identification Cards (NJAC 17:30-8.1)

Every owner, principal, management services contractor, employee, or volunteer license holder or a testing laboratory that accesses the premises of our facility or handles cannabis on our behalf will be required to register with the Commission and be issued a Cannabis Business Identification Card. We require that employees wear their Cannabis Business Identification Card chest high at all times that they remain on the premises.

Before beginning employment we will verify that each prospective employee requesting a Cannabis Business Identification Card: (1) is at least 21 years of age; (2) has completed a Commission approved training course, including all topics listed in NJAC 17:30-8.1(b)(2); (3) has authorized a criminal history background check pursuant to N.J.A.C. 17:30-7.12(d) and does not have any disqualifying convictions that have not been found to be rehabilitated; and (4) has paid the Cannabis Business Identification Card fee, pursuant to N.J.A.C. 17:30-7.17.

We will assist prospective employees in completing the Cannabis Business Identification Card application, including submitting all required documents pursuant to N.J.A.C. 17:30-7.12. Prospective employees shall not begin working at our facility before the Commission issues a

Cannabis Business Identification Card and the card is in the registrant's physical possession.

b. Cannabis Business Premises (NJAC 17:30-9.1)

We will conduct all operations authorized by the Act and this chapter at the address(es) identified on the license(s) issued by the Commission. Upon issuance, we will display our license in a conspicuous location at all times.

c. Changes to license applicant or license holder; approval and notice; provisional approval (NJAC 17:30-9.2)

Should our business require any material changes to our license as listed in NJAC 17:30-9.2(a), we will submit an application for an amended license, along with the applicable fee, if any, pursuant to N.J.A.C. 17:30-7.17.

d. Ongoing Material Conditions and General Requirements Applicable to Cannabis Business License Holders (NJAC 17:30-9.4)

We will abide by the following regulations related to Material Conditions and General Requirements:

- No person or entity shall operate a cannabis business without a Commission-issued license.
- A cannabis business shall only be operated under the name on the license, which shall be the legal entity name as found on the New Jersey business registration of the license holder.
- A license holder and its owners, principals, employees, management services contractors, financial sources, and vendor-contractors shall: (1) Maintain qualification to hold a license pursuant to N.J.A.C. 17:30-7.4, as applicable; (2) Comply with the Act and this chapter; and (3) Cooperate with the Commission and its staff.
- Upon request of the Commission, a license applicant or license holder shall provide, for any submission to the Commission, a redacted copy that may be released to the public. (1) Redactions shall be limited to information that is likely to be found to be exempted pursuant to N.J.S.A. 47:1A-1 et seq., or the common law on public records.
- A license holder shall make a good faith effort to recruit and employ persons who would otherwise qualify for the provisions at N.J.A.C. 17:30-6.6(a)1 or 2.
- The maintenance of a labor peace agreement with a bona fide labor organization by a licensed cannabis business, including an expanded ATC, shall be an ongoing material condition of the cannabis business's license.
- Where a majority of the employees of a cannabis business, including an expanded ATC, have voted to join a bona fide labor organization, failure to enter, or to make a good faith effort to enter, into a collective bargaining agreement within 200 days of the opening of such licensed cannabis business, may result in the suspension or revocation of the cannabis business's license.
- A license holder shall maintain sanitary conditions throughout the cannabis business premises.
- A cannabis business shall seek to prevent the escape of odors associated with cannabis

over the boundary of the property. Failure to engage in such an effort may result in sanctions, including civil monetary penalties.

- A license holder shall implement a plan to increase sustainability in its operations, which may include, but is not limited to: (1) A waste reduction plan; (2) A water usage reduction plan; (3) Biodynamic farming; (4) A sustainable packaging plan that reduces or eliminates the use of single-use plastics and promotes the use of recyclable or green packaging; or (5) A plan to use some amount of renewable energy to power its operations.
- A visitor entering a cannabis business premises must be accompanied by an escort with a Cannabis Business Identification Card at all times, except in the consumer area of a cannabis retailer. A vendor-contractor's staff shall be considered to be a visitor during any time present at a cannabis business premises, except if the person possesses a Cannabis Business Identification Card.

e. Prohibitions (NJAC 17:30-9.5)

The following activities will be prohibited from taking place on facility grounds or within the general vicinity, whether by an owner, principal officer, employee, volunteer, or anyone affiliated with our facility:

- The consumption of cannabis or alcohol will not be tolerated on the premises of the cannabis business, or in public areas in the vicinity of such premises.
- Sales of food, beverages, alcohol, or tobacco on the premises will not be permitted.
- Entry onto the premises by a person who is under the age of 21 is prohibited, unless the individual is accompanied by and supervised by a parent or legal guardian or is otherwise permitted by law.
- A sale or give for consumption any cannabis items to a person under 21 years of age will <u>never</u> be permitted. If any employee is found to have sold cannabis to a person under 21 years of age, they will be terminated immediately.
- We will not use, display, advertise, or operate under any alternate name, including, but not limited to, any doing business as name, nor shall it hold itself out to be an entity operating under an alternate name.

f. Cannabis Business Operations Manual (NJAC 17:30-9.6)

We will develop, implement, and maintain, on the premises, an operation manual that addresses, at a minimum, the following: (1) Procedures for the oversight of the cannabis business, which shall include: (i) Adverse event reporting; (ii) Quality assurance and quality control; (iii) Recall of cannabis items as needed or directed; (iv) Packaging and labeling of cannabis items; (v) Inventory control, storage, diversion prevention; (vi) Waste disposal/sanitation; (vii) Accounting and tax compliance; and (viii) Reporting of test results, as applicable, based on the class of license sought; (2) Procedures for safely cultivating, manufacturing, or selling cannabis, as applicable; (3) Procedures to ensure accurate recordkeeping, including inventory procedures to ensure that quantities cultivated do not suggest redistribution; (4) Employee, visitor, and facility security policies; (5) Safety procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies, and personal safety and crime prevention techniques; and (6) A description of the cannabis business's: (i) Hours of operation and after-hour contact information; (ii) Fee schedule; (iii) Confidentiality and privacy standards regarding cannabis business operations and consumers, as applicable; (iv) For a cannabis retailer, criteria for refusing service to a consumer pursuant to unacceptable behavior; and (v) Procedures for ensuring consumers comply with cannabis business age verification policies. The operations manual will be made available to the Commission for inspection upon request.

g. Cannabis Business Training (NJAC 17:30-9.8)

In addition to workplace training required by law, and our internal SOP training, each owner and principal that handles cannabis and each employee and volunteer and any management services contractor staff of our business will complete at least eight hours of ongoing training each calendar year. The training shall be tailored to the roles and responsibilities of the person's job or role function and shall include: (1) State and Federal laws regarding cannabis; (2) State and Federal laws regarding privacy and confidentiality; (3) Informational developments in the field of cannabis; (4) The proper use of security measures and controls that have been adopted; and (5) Specific procedural instructions In order to provide such training pursuant we will either: (1) Develop, implement, and maintain on the premises a training curriculum; or (2) Enter into contractual relationships with outside resources capable of meeting personnel training needs. for responding to an emergency, including a robbery or workplace violence. No person affiliated with our business will be permitted to begin work at our cannabis business before completing initial training in accordance with N.J.A.C. 17:30-8.1(b), unless otherwise approved by the Commission.

h. Alcohol/Drug/Smoke-free workplace; employee assistance program (NJAC 17:30-9.9)

We will establish, implement, and adhere to a written policy prohibiting our personnel from consuming or being under the influence of cannabis at the workplace, provided that we shall not infringe upon the rights of qualifying patients under P.L. 2019, c. 153 (N.J.S.A. 24:6I-5.1 et seq.). We will ensure that this policy is available to the Commission upon request. We will also maintain a contract with an approved New Jersey employee assistance program.

i. Security (NJAC 17:30-9.10)

We will provide effective controls and procedures to guard against: unauthorized access to the premises or our electronic systems; theft; and diversion of cannabis. Such controls may include, but are not limited to, systems to protect against electronic records tampering. At a minimum, we will:

- Install, maintain in good working order, and operate a safety and security alarm system at its premises that will provide suitable protection against theft and diversion and that complies with NJAC 17:30-9.10(b)(1)(i-ii).
- Implement appropriate security and safety measures to deter and prevent the unauthorized entrance into areas containing cannabis and the theft of cannabis;
- Implement security measures that protect the premises, consumers, and cannabis business

personnel;

- Establish a protocol for testing and maintenance of the security alarm system;
- Conduct maintenance inspections and tests of the security alarm system at the cannabis business's authorized location at intervals not to exceed 30 days from the previous inspection and test and promptly implement all necessary repairs to ensure the proper operation of the alarm system;
- In the event of a failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours we will comply with NJAC 17:30-9.10(b)(6)(i-ii).
- Keep access from outside the premises to a minimum and ensure that access is well controlled.
- Limit entry into areas where cannabis is held to authorized personnel.
- Equip interior and exterior premises with electronic monitoring, video cameras, and panic buttons meeting the specifications of NJAC 17:30-9.10(b)(9)(i-ii).
- Keep the outside areas of the premises and its perimeter well-lighted in accordance with the NJAC 17:30-9.10(b)(10)(i-ii).
- Provide law enforcement and neighbors within 100 feet of the cannabis business with the name and phone number of a staff member to notify during and after operating hours to whom they can report problems with the establishment.

Our security alarm system and video surveillance system shall be continuously monitored, 24 hours a day, seven days a week.

j. Reportable Events Involving Risk of Inventory Loss (NJAC 17:30-9.11).

Upon becoming aware of a reportable loss, discrepancies identified during inventory, diversion, or theft, whether or not the cannabis, funds, or other lost or stolen property is subsequently recovered and/or the responsible parties are identified, and action taken against them, we will: (1) Immediately notify appropriate law enforcement authorities by telephone; and (2) Notify the Commission no later than three hours after discovery of the event. We will notify the Commission within 24 hours by telephone, followed by email notification within five business days of any of the following: (1) An alarm activation or other event that requires response by public safety personnel; (2) A breach of security; (3) The failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours; and (4) Corrective measures taken, if any.

k. Accessibility of Cannabis Storage Areas (NJAC 17:30-9.12).

We will limit access to cannabis item storage areas to the minimum number of authorized personnel necessary to maintain safe and orderly operations. When it is necessary for visitors to be present in or pass through cannabis item storage areas, we will provide for adequate observation of the area by security personnel. Our SOPs will identify the personnel with authorization to access the storage area. Our Company will store finished usable cannabis and cannabis products that are ready for sale in a locked area, which may include a locked room, cage, or safe, with adequate security and limited access.

l. Inventory (NJAC 17:30-9.13).

Inventory tracking is a central part of our business plan. As such, each Record of Inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the name, signature, and title of the persons who conducted the inventory. Our Company will: (1) Utilize the inventory tracking system designated by the Commission pursuant to N.J.A.C. 17:30-3.12 in accordance with NJAC 17:30-9.13(a)(1); (2) Conduct an initial comprehensive inventory of all cannabis in the possession of the cannabis business as detailed in NJAC 17:30-9.13(a)(2); (3) Establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of cultivating, stored, usable, and unusable cannabis; (4) Update product inventories on at least a daily basis; (5) Conduct a monthly inventory audit of cultivated, stored, usable, and unusable cannabis; (6) Conduct a comprehensive annual inventory audit at least once every year from the date of the previous comprehensive inventory; and (6) Promptly transcribe inventories.

m. Destruction of Cannabis (NJAC 17:30-9.14).

When our company disposes of or destroys cannabis, we will destroy it or render it unusable and shall create and maintain a written record of the disposal of the cannabis, weigh the cannabis and update it in our inventory prior to disposal or destruction. If our license expires without being renewed or is revoked, we shall: (1) Immediately discontinue any production or sale of cannabis items; (2) Weigh any cannabis in inventory and update it in the inventory prior to disposal or destruction; (3) Destroy or dispose of all unused cannabis or surplus inventory in our possession by providing it to the Commission for destruction within 72 hours of the license expiring; and (4) Create and maintain a written record of the disposal. Within 10 business days after destruction, we shall notify the Commission, in writing, of the amount of cannabis destroyed, including the form, weight, quantity, and any other information requested.

n. Secure Transport (NJAC 17:30-9.15).

Our Company will ensure that any cannabis transported from our facility to another licensed facility is done in a safe and secure manner. Each vehicle will be equipped with: (1) A secure lockbox or secure cargo area, which shall be used for the sanitary and secure transport of cannabis; (2) A Global Positioning System (GPS) device for identifying the geographic location of the delivery vehicle, either permanently or temporarily affixed to the delivery vehicle while the delivery vehicle is in operation that complies with NJAC 17:30-9.15(c)(2)(i-ii); and (3) Functioning heating and air conditioning systems appropriate for maintain correct temperatures for storage of cannabis and cannabis products. We will make sure that any delivery vehicle bears no markings that would either identify or indicate that the vehicle is used to transport cannabis. Each delivery vehicle will be staffed with at least one cannabis business staff member in accordance with NJAC 17:30-9.15(g)(1-5).

We will also ensure that transports are completed in a timely and efficient manner in compliance with the requirements of NJAC 17:30-9.15(i)(1-2). We shall maintain a written or electronic record of each transport of cannabis; for each transport, such record shall include: (1) The date and time that the transport began and ended; (2) The name, Cannabis Business Identification Card number, and signature of the cannabis business staff member performing the transport; (3) The weight of the cannabis or cannabis items transported; (4) The batch number of the usable cannabis or the lot number of the cannabis product, the name of the strain/cultivar, and the form of the cannabis product; and (5) The signature of the cannabis business staff member of the receiving cannabis business attesting to receipt of the goods.

We will maintain current hired and non-owned automobile liability insurance sufficient to insure all delivery vehicles in the amount of at least $1,000,000 per occurrence or accident. Upon request, we will provide the Commission with information regarding any delivery vehicles, including the vehicle's make, model, color, vehicle identification number, license plate number, and vehicle registration. We will report any vehicle accidents, diversions, losses, or other reportable events that occur during transport to the Commission in accordance with N.J.A.C. 17:30-9.11. Where a transport is attempted and not completed and the cannabis item remains in the possession of our transport personnel, we will return the cannabis item to the originating cannabis business. The items will be restocked if the items are in new, unopened condition prior to restocking. Each restocked item will be properly logged in our internal inventory.

o. Cannabis Business Complaint Process (NJAC 17:30-9.16).

We will establish SOPs for receiving and recording complaints associated with usable cannabis or cannabis products that we have cultivated, manufactured, sold, or distributed that shall include each of the processes and procedures outlined in NJAC 17:30-9.16(a)(1-6). Similarly, we will establish a process for complaints involving adverse events, which shall include the requirements of NJAC 17:30-9.16(c)(1-6). All adverse events shall be reported to the Commission within 48 hours. The review/investigation of a complaint or adverse event, and the findings and follow-up action of any investigation, must extend to all related batches/lots and relevant records and to all cannabis businesses involved in the supply chain of the product identified in the complaint. We will keep a written record for 4 years of the complaint, adverse event and investigation, including the data outlined in NJAC 17:30-9.16(f)(1-7).

p. Cannabis Business Recall Process (NJAC 17:30-9.17).

We will develop and implement a recall plan addressing at a minimum: (1) Factors that necessitate a recall procedure, including if testing laboratory testing analysis finds that the batch or lot fails to meet specifications; (2) Personnel responsible for initiating and implementing a recall; (3) Notification protocols, including as required at N.J.A.C. 17:30-9.16; and (4) Receipt, handling, and disposition of returned usable cannabis or cannabis products. Further, we will establish an SOP for publicly communicating a recall of usable cannabis or cannabis products manufactured from that usable cannabis or other cannabis products that present a probability that exposure to the product could cause serious adverse health consequences or temporary or medically reversible adverse health consequences; this standard operating procedure shall include each requirement established in NJAC 17:30-9.17(b)(1-5).

We will collect all recalled cannabis items that are returned, have cannabis business personnel that supervise quality control review it, track it in inventory control, and segregate it in quarantine until the Commission authorizes disposal, at which point we shall dispose of it in a manner that ensures that it is unusable. Our Company will comply and cooperate with any recalls ordered by the Commission.

q. Cannabis Retailer Premises (NJAC 17:30-12.1).

Our Company will not operate or be located in, or upon, any premises in which operates: (1) A grocery store, delicatessen, indoor food market, or other store engaging in retail sales of food; or (2) A store that engages in licensed retail sales of alcoholic beverages, as defined at N.J.S.A. 33:1-1.b. NJAC 17:30-12.1(a). We will only sell cannabis at the cannabis business premises authorized in the license, including any indoor or outdoor areas, including as provided at N.J.A.C. 17:30-12.4. NJAC 17:30-12.1(b).

r. Cannabis Retailer Authorized Conduct/Prohibitions (NJAC 17:30-12.2).

We understand we are only permitted to: (1) Purchase or acquire usable cannabis from cannabis cultivators or cannabis retailers; (2) Purchase or otherwise obtain cannabis products and related supplies from cannabis manufacturers, cannabis wholesalers, or cannabis retailers; (3) Purchase or acquire paraphernalia; (4) Possess, display, transport, and transfer usable cannabis, cannabis products, paraphernalia, and related supplies; and (5) Distribute, supply, sell, or furnish usable cannabis, cannabis products, paraphernalia, and related supplies to a consumer or to other cannabis retailers. NJAC 17:30-12.2(a). Further, we are aware that we may: (1) Sell usable cannabis and cannabis products to consumers in any authorized form, in accordance with N.J.A.C. 17:30-11.2(c) (NJAC 17:30-12.2(c)); (2) only sell cannabis items directly to a consumer. 17:30-11.2(c) (NJAC 17:30-12.2(f)); and (3) must maintain and make available on our Internet website, if any, a standard price list that shall apply to all usable cannabis, cannabis products, paraphernalia, and related supplies sold by our company (NJAC 17:30-12.2(g)). Lastly, we will consider whether to make interpreter services available to the population served, including for individuals with a visual or hearing impairment. If interpreter services are necessary, we will assume the cost of providing such interpreter services. NJAC 17:30-12.2(h).

We also understand that we are not permitted to: (1) cultivate cannabis; or (2) produce, manufacture, or otherwise create cannabis products. NJAC 17:30-12.2(b). Additionally, we will not: (1) allow persons under the age of 21 to purchase cannabis items or to enter or remain on the premises unless accompanied by a parent or legal guardian and shall ensure similar restrictions are enacted on any internet site operated by our company; or (2) allow persons under the age of 21 to purchase cannabis items. NJAC 17:30-12.2(d-e).

s. Cannabis Retailer Sale to a Customer (NJAC 17:30-12.3)

In compliance with NJAC 17:30-12.3(a),before allowing entrance to our facility, and additionally prior to selling or serving cannabis items to a consumer, for each transaction, we will shall examine any one of the following pieces of photographic identification and shall confirm the consumer is of legal age to purchase cannabis: (1) The person's United States passport; other country's passport; or proper government-issued documentation for international travel, provided it is lawful to use as identification in the United States; (2) The person's motor vehicle driver's license, whether issued by New Jersey or by any other state, territory, or possession of the United States, or the District of Columbia, provided the license displays a picture of the person; (3). A New Jersey identification card issued by the New Jersey Motor Vehicle Commission; or (4) Any other identification card issued by a state, territory, or possession of the United States, the District of Columbia, or the United States that bears a picture of the person, the name of the person, the person's date of birth, and a physical description of the person. Our personnel shall log that the examination of photographic identification and confirmation of legal age occurred in a record, and we will maintain such record and it shall be available for inspection by the Commission. NJAC 17:30-12.3(c).

In order to ensure that individual privacy is protected, we will: (1) ensure that consumers are not required to provide personal information other than government-issued identification in order to determine the consumer's identity and age; (2) not collect and retain any personal information about a consumer other than information typically acquired in a financial transaction conducted by the holder of a Class C retail license concerning alcoholic beverages as set forth at N.J.S.A. 33:1-12; and (3) not keep a copy of the consumer's photographic identification. NJAC 17:30-12.3(b).

We will not sell to a consumer in a single sales transaction: (1) More than one ounce of usable cannabis; (2) The equivalent of more than one ounce of usable cannabis as a cannabis-infused product in solid, liquid, or concentrate form; (3) More than five grams of cannabis concentrate; or (4) Some combination thereof, not to exceed one ounce, or the equivalent, of usable cannabis and cannabis products. NJAC 17:30-12.3(d). We will make a good faith effort to prevent a consumer from exceeding one ounce of usable cannabis or the equivalent weight in cannabis products, in multiple sales transactions. NJAC 17:30-12.3(e). We will provide customers with a receipt that includes, at a minimum: (1) Its name, address, license number, and telephone number; (2) The date of retail sale; and (3) The cannabis items purchased and their purchase price. NJAC 17:30-12.3(g).

For the sale of electronic smoking devices, we will provide a supplemental information document that: (1) Lists all ingredients or materials used to manufacture the electronic smoking device; (2) Provides instructions to consumers on how to use the electronic smoking device safely as part of intended usage based on manufacturer's recommendations, which shall include, but not be limited to, a recommended number of seconds per dose; and (3) States, "Electronic smoking devices and vaporized formulations of cannabis are not approved by the Food and Drug Administration and have not been proven to be safe for use in humans. Consumers should consider alternative methods for the administration of cannabis." NJAC 17:30-12.3(h).

We will offer to provide a copy of the written report from the testing laboratory pursuant to N.J.A.C. 17:30-16.6 as a supplemental informational document to the adult consumer. NJAC 17:30-12.3(i). We will only sell to consumers cannabis items that have been properly tested, packaged, sealed, and labeled in accordance with the provisions at N.J.A.C. 17:30-13.2 and 13.3. NJAC 17:30-12.3(f). Lastly, we will collect any tax from a consumer required by the Act and this chapter. NJAC 17:30-12.3(j).

t. Curbside Retail Sales (NJAC 17:30-12.4)

We will conduct curbside retail sales in accordance with NJAC 17:30-12.4 1 upon approval of the Commission. NJAC 17:30-12.4(a). Prior to initiating curbside retail sales, we will provide the Commission with, and shall seek approval from the Commission on, standard operating procedures regarding: (1) Taking cannabis item orders, verifying photographic identification, and receiving payment; (2) Logging transactions in the Commission-designated inventory management system, and, as applicable, the internal inventory management system; and (3) Security needed to accommodate curbside retail sales. NJAC 17:30-12.4(b).

If approved for curbside retail sales, we will ensure: (1) A consumer shall place an order in advance; (2) Usable cannabis and cannabis products shall be labeled in the premises prior to retail sale on the exterior of the facility; (3) we will provide a consumer with an approximate pick-up time to reduce traffic around the premises; (4) Prior to making a retail sale, our personnel will conduct an in-person visual verification of the consumer's photographic identification; (5) All transactions shall be appropriately logged in the Commission-designated inventory management system, and as applicable, the internal inventory management system in accordance with N.J.A.C. 17:30-9.7 and 9.13; and (6) All transactions shall be conducted in a secure and monitored manner in accordance with N.J.A.C. 17:30-9.10. NJAC 17:30-12.4(c).

If approved by the Commission, we will notify the municipality in which our facility is located and local law enforcement that it intends to conduct curbside retail sales. NJAC 17:30-12.4(d).

u. Cannabis Retailer Recordkeeping and Reporting (NJAC 17:30-12.5)

Pursuant to NJAC 17:30-12.5(a), we will keep a complete and accurate record of all cannabis item sales and deliveries made to consumers by the retailer or a cannabis delivery service acting on its behalf. These records shall be kept and maintained for four years, either on-premises or at an off-site facility, in written or electronic form. NJAC 17:30-12.5(a)(1). We will collect and report to the Commission for each calendar year at least the following statistical data: (1) The number of consumers who purchased each cannabis item sold; (2) Total number of cannabis item transactions; (3) Taxes collected; and (4) Such other information as the Commission may require. NJAC 17:30-12.5(b).

v. Cannabis Retailer Recordkeeping and Reporting (NJAC 17:30-12.5)

Prior to the opening date of our cannabis business, we will establish and implement policies describing our plans for providing information and communicating to consumers as to: (1) Limitations of the right to possess and use cannabis items pursuant to the Act and regulations; (2) Potential side effects of cannabis use; (3) The differing strengths of cannabis items sold; (4) Safe techniques for use of cannabis items and paraphernalia, noting the potential variations in feeling the effects of cannabis; (5) Alternative methods and forms of consumption or inhalation by which one can use cannabis items; (6) Signs and symptoms of substance abuse;

(7) Opportunities to participate in substance abuse programs; and 8. Information on tolerance, dependence, and withdrawal. NJAC 17:30-12.5(a). We will maintain, and make available for distribution to consumers, an adequate supply of up-to-date informational materials addressing the matters identified in the policies developed pursuant to the above, and will make such informational materials available for inspection by the Commission upon request. NJAC 17:30-12.5(b)(1).

w. Cannabis Retailer Storage (NJAC 17:30-12.7)

All cannabis items shall be stored in an enclosed indoor, locked area pursuant to N.J.A.C. 17:30-9.12 where access to such area is limited to an owners, principals, employees, or volunteers of our business or staff members of a management services contractor that possesses a Cannabis Business Identification Card when acting in their official capacity.

x. Home Delivery (NJAC 17:30-12.8)

If approved by the Department, we will allow a licensee holding a Class 6 Cannabis Delivery license to deliver cannabis items to consumers on behalf of our company. We will ensure that our practices, along with those of our delivery partner, comply with all of the provisions of NJAC 17:30-12.8.

y. Tax Stamp and Tracking (NJAC 17:30-13.4)

Every cannabis item shall contain a unique stamp or tag, as prescribed by the Commission, win compliance with NJAC **17:30-13.4(a).**

z. Cannabis Item Packaging and Labeling; Prohibitions (NJAC 17:30-13.5)

The packaging and labeling of cannabis items shall not contain any of the items prohibited NJAC 17:30-13.5(a).

aa. Cannabis Item Packaging and Labeling; Universal Symbol (NJAC 17:30-13.6)

Once established by the Commission, we will imprint the Universal Symbol on all packages of cannabis items in a form and manner prescribed by the Commission.

bb. General Advertising Requirements and Prohibitions (NJAC 17:30-14.2).

We will only advertise when we have obtained reliable evidence that at least 71.6 percent of the audience for the advertisement is reasonably expected to be 21 years of age or older. All advertisements of any cannabis product, or cannabis paraphernalia shall contain the following warning: "This product contains cannabis. For use only by adults 21 years of age or older. Keep out of the reach of children. There may be health risks associated with the consumption of this product, including for women who are pregnant, breastfeeding, or planning on becoming pregnant. Do not drive a motor vehicle or operate heavy machinery while using this product."

Our advertisements will disclose that the facility is licensed by the State of New Jersey.

We will not advertise any cannabis business, cannabis product, or cannabis Paraphernalia in violation of NJAC 17:30-14.2(d). Nor will we violate NJAC 17:30-14.2(e). If we choose to advertise, we will keep records as reliable evidence that the advertisement meets the requirements of this subchapter, which shall be available, upon request, to the Commission. The records shall include a precise description of the audience that is reasonably expected for an advertisement, and a list of all publications and venues in which an advertisement was published.

5. Plan to Comply With All Local Rules and Regulations

We will comply with all Borough of Bellmawr rules and regulations, including with the regulations included in §260-60.1 Cannabis Establishment as Conditionally Permitted Use Overlay Zone. This includes, but is not limited to, complying with the following:

(1) All cannabis establishments Class 1 through 6, located with the Borough shall meet all requirements for licensure and hold the appropriate license issued by the Cannabis Regulatory Commission, Department of Treasury, State of New Jersey.
(2) No cannabis establishment shall permit on-site consumption of cannabis or cannabis-related products including no on-site sales and consumption of alcohol or tobacco products.
(3) No outside storage of any cannabis, cannabis products or cannabis-related materials shall be permitted.
(4) Hours of operation of any cannabis retail facility shall be limited from 8:00 a.m. to 7:00 p.m., seven days a week.
(5) For each cannabis establishment located within the Borough a security plan to be approved by Bellmawr Police Department shall be provided to demonstrate how the facility will maintain effective security and control of the operations. The plan should include the following but not limited to:

(a) Type of security systems to be installed.
(b) Installation, operation and maintenance of security camera coverings all interior and exterior parking lots, loading areas and other such areas of the establishments.
(c) Tracking and record keeping of products and materials.
(d) Type of lighting provided in and around the establishments.
(e) Location on site security team and armed guard on premises.

(6) All cannabis establishments, particularly Class 1, 2, 3, 4 and 5, shall provide detail information on odor control from these sites. This shall include air treatment systems with sufficient odor absorbing ventilation and exhaust systems such that any odors generated inside the facility are not detectable are not detectable by a person of reasonable sensitivity anywhere on adjacent property, within public rights of way, or within any other unit located in the same building if the use occupies a portion of a building.
(7) All cannabis establishments shall provide for noise mitigation features designed to minimize disturbance from machinery, processing and or packaging operations, loading and other noise generating equipment of machinery. All licensed facilities must operate within applicable state decibel requirements.
(8) Loitering, disruption to/and or obstruction of the free passage of persons or vehicles in

immediate vicinity of the property shall be considered unlawful.
(8) All cannabis establishment operations such cultivation, manufacturing, wholesale packaging, retail, and laboratories shall be conducted within a building. No operations shall be conducted outside.
(9) Class 1, Class 2, Class 3 and Class 4 shall have minimum lot area of 2.5 acres.
(10) No cannabis establishments shall be located within 200 feet of a residential zone, house of worship, school, or day care.
(11) Other than the minimum lot area requirements for Class 1, Class 2, Class 3 and Class 4 cannabis operations as required under this section, all lot and bulk regulations shall comply with §260-67.
(12) Off-Street Parking: One per every 250 square feet of gross floor area. Where the calculation results in a fraction of a space, the required number of parking spaces ahll be rounded to the nearest whole number.
(13) Landscaping shall comply with § 260-58.
(14) Utilities shall comply with § 260-59.
(15) Except for the required number of off-street parking spaces, which is prescribed under this section, all off-street parking and loading shall comply with Article XVI.
(16) Signage shall comply with Article XVII.
(17) Fences, hedges and walls shall comply with Article XVIII.
(18) All development in this overlay zone is subject to building design and site plan review per Article XXI.
(19) Performance standards shall comply with Article XX.

Odor Mitigation Plan

As an applicant with significant cannabis retail experience, our Company not only takes odor mitigation very seriously, but we have already developed standard systems and processes for odor mitigation that will make our proposed Bellmawr cannabis retail facility odor free. These systems and processes are summarized below.

First, it should be note that the cannabis products that we will sell at our retail dispensary will be pre-packaged at the cultivation and/or processing sites from which they are purchased and as such will not be packaged at our facility. This means that any cannabis odor that is typically associated with cannabis flower or to cannabis processing will be mitigated prior to arriving at our facility (i.e., they will be received in fully sealed packaging). Nevertheless, our experience in cannabis retail has taught us that to eliminate the risk of any potential odor that may come from the bulk storage of even fully packaged cannabis products, extra measures to prevent undesirable odors like bio-filtration systems as well as air-sealed storage techniques and odor monitoring tools are best practices for odor mitigation.

Summary of Odor Prevention Systems/Processes:

Controlled Storage: All products will be securely stored in our vault room to maintain the integrity of products. The Vault Room will be temperature-controlled to maintain freshness and pureness of all inventory. The room is designed to be a cool, low energy usage, properly-lit room with proper ventilation, temperature, and humidity control equipment. It will have a separate HVAC system from the main facility that will be used solely to control the temperate, humidity, and airflow within that room. The primary control systems/settings will be:

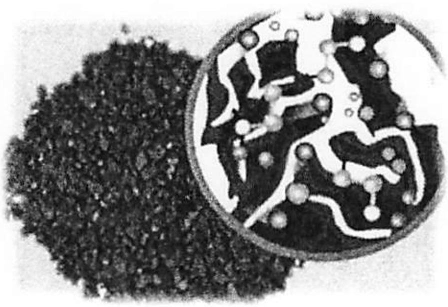
1. Humidity - shall be controlled through a closed loop system of filtration and removal of air moisture and the reintroduction of water content to achieve and maintain the desired humidity level of 55% (+/- 2%).

2. Air Purity - as a part of the closed loop filtration, all air will be circulated and cleaned utilizing carbon and HEPA filters for the purposes of air purity (reduction of particulate) and for odor control elimination.

3. Temperature - control for the Vault Room shall be independent of the rest of the facility to provide ideal conditions for product storage and integrity of stored cannabis product so as not to exceed 65 degrees Fahrenheit.

Charcoal Air Filters and HVAC: We will design our facility with an HVAC system that will include charcoal air filters and monitoring tools that will be utilized to clean and reduce smells as well as alert our employees when odor ratios increase beyond the normal range.

A charcoal air purifier or charcoal filter, also commonly known as an activated carbon air filter, works by absorbing the gases and odors in the air. The charcoal pellets are activated carbon that have been treated with oxygen to open up millions of pores in between the carbon atoms. This works so well because the millions of tiny cells that are in the charcoal in addition to being very porous also attract and capture odors and gases. Charcoal filters help clean air of particles so as to reduce airborne odors. Our HVAC system will also consist of a carbon filtration system to circulate and remove odors and toxic chemicals.



We will ensure our odor mitigation system is in good working order with monthly inspections from a certified engineer. All controls will be monitored in such a way so as to know how efficient and effective our facility is mitigating odors.

We also plan to use ozone generators that will be utilized when necessary to measure Dilution to Threshold (D/T) ratios indicated by our D/T sensors.

Facility Design: Our facility will have stationary windows, meaning they cannot be opened. All our doors will be sealed with proper weather stripping, keeping air circulating and filtered inside of our facility. Onsite use of cannabis products will be strictly prohibited, which we believe helps further mitigates any potential cannabis odors from reaching to our neighbors.

Odor Monitoring: Each day the manager or supervisor on duty will assess any on-site or off-site odors. Not only will we physically monitor odors from outside the facility, the manager on duty will also be responsible for assessing and documenting odor impacts daily. To enhance our odor detection, we will purchase the Nasal Ranger – a device used to quantify odor strength in terms of Dilution to Threshold (D/T) ratios. Scientific studies have determined that a 7:1 D/T ratio is the lowest level at which cannabis odors can be detected. As such, we use a 6:1 D/T ratio as the maximum allowable threshold and our odor mitigation efforts are directed at maintaining a D/T ration below 6:1. The Nasal Ranger also has a subscription web-based application that serves as an electronic repository for all odor data.

Remediate: In the highly unlikely event that questionable or objectionable off-site cannabis odors are detected by the public, the following protocols will be put into immediate action: Investigate the likely source of the odor; Utilize on site management practices to resolve the odor event including monitoring tools to document D/T; Take steps to reduce the odor-generating source; Determine if the odor traveled off-site by surveying the perimeter and making observations of existing wind patterns; Document the event for further operational review and the formulation of a corrective action plan.

Staff Training: All employees will be trained on how to detect, prevent and remediate cannabis odors.