

# CANNABIS SAFETY PLAN

The Hollister Police Department Cannabis Safety Unit's primary function is to ensure the ongoing safety, security, and compliance of cannabis operations. The unit also conducts law enforcement trainings and civilian information presentations.

The purpose of these safety plan requirements is to ensure the safety and security of cannabis facilities, their employees, and the general public. The Hollister Police Department recognizes that each facility differs slightly from next and reserves the right to adjust the requirements to fit each facility as needed.

The Hollister Police Department reserves the right to make changes or adjusts to this safety plan without notice.

It is the responsibility of each individual at the facility to be familiar with these safety requirements.

- **Location exterior:**

1. **Windows-** All windows shall be secured from the inside in a manner that prevents the opening of them from the outside. All ground level windows shall not be opened while there is any form of cannabis or cannabis related products on the property. Windows shall be covered with a film or covering on the interior so that no cannabis, cannabis related products, or cannabis related movement(s)\* are visible from the outside. All exterior windows shall be shatterproof and reinforced with safety film or similar product to prevent the breaking of windows which would allow unwanted entry into the premises. This film or product will be secured to the window frame using an adhesive that will bond the film/product to the frame.
2. **Signage-** In addition to the requirements otherwise set forth in this section, business identification signage for a cannabis facility shall conform to the requirements of the Municipal Code, including, but not limited to, seeking the issuance of a City sign permit. Each entrance to a cannabis facility shall be visibly posted with a clear and legible notice indicating that smoking, ingesting, or otherwise consuming cannabis on the premises or in the areas adjacent to the cannabis facility is prohibited. Business identification signage shall be limited to that needed for identification only, and shall not contain any logos or information that identifies, advertises, or lists the services or the products offered. No cannabis facility shall advertise by having an individual holding a sign and advertising

the business to passersby, whether such person is on the premises of the cannabis facility or elsewhere including, but not limited to, the public right-of-way. No “A Frame” style signs allowed in front of the facility or on the curbside. Ensure no signage has any characters, words, logos, fonts, colors, or other visual keys/clues that could be appealing to children. Ensure that no signage covers any portion of the windows or doors. Signage shall not be directly illuminated, internally or externally, except that the name and address of the business may be illuminated at night.

3. **Roof Hatches, Skylights, and Ceilings-** All roof hatches shall be secured from the inside and shall be constructed in a way to eliminate any unwanted access from the roof. All exterior roof access ladders, pipes, poles, etc. shall be secured in a manner that prevents anyone from gaining unwanted access to, or the ability to climb, from the ground or another building, onto the roof of the facility. Any ventilation or air duct work shall be secured to eliminate any possible intrusion into any cannabis facility.
4. **Landscaping-** All trees, shrubs, and bushes shall be kept trimmed so that all windows and doors and portions thereof are clearly visible from the street or open spaces allowing clear view of such. All trees, shrubs, and bushes shall be kept trimmed so there is a four feet (4’) clearance between them and any entry/exit doors. All dead/dying landscaping and weeds shall be removed immediately so that a clean, professional image is maintained. All trees and shrubs/bushes shall be trimmed away from fences and buildings to prevent the easy climbing of, or hiding behind them.
5. **Fencing-** All fencing shall be kept in good order as determined by Officers. The fencing shall be clear from holes and damage that could allow any person to climb through, over, or crawl under the fence. Fencing shall be six feet (6’) tall chain link with three (3) strand barbed wire along the top. Alternative safety fencing can be used after approval by the police department to prevent unwanted entry.

Gates shall be opened only long enough to allow the one vehicle actively entering or exiting. Gates shall not be left open or unsecured. All gates shall be monitored by an employee or security guard for the duration it is open.

6. **Entry/exit doors-** All public access entry/exit doors shall only be opened by use of a key or other approved method on the exterior or by remote release from inside the business. Any exterior door used by employees for entry into the facility shall be opened by use of a biometric lock only. All emergency exit doors shall be easily opened from the interior by way of ADA compliant mechanism to allow immediate and uninhibited exit from the building in the case of an emergency.

All exterior doors containing any amount of glass shall have the same requirements as exterior windows. All non-public access entry/exit doors shall be equipped with a closing

mechanism that will automatically close the door when not held open by a person. At no time shall any device or object be used to hold the door open or prevent it from shutting automatically.

All exterior access doors will be approved by the police department. Exterior doors not used as employee access or delivery doors will be secured in a fashion so they may not be opened from the exterior and will be deemed emergency exit doors only.

All emergency exit doors will be equipped with an audible alarm system that is monitored by a central alarm company. All emergency exit alarms will require the dispatching of a Police Officer the same as a burglar alarm response.

All emergency exit doors shall be solid core wooden or substantial metal doors featuring hinge-pin removable deterrence. Emergency exit doors shall have latch guards at least twelve inches (12”) in length protecting the locking bolt area. Latch guards shall be a minimum of 0.125-inch thick steel, affixed to the exterior of the door with non-removable bolts, and attached so as to cover the gap between the door and the doorjamb for a minimum of six inches (6”) both above and below the area of the hatch.

All employee entrance doors shall have the same hinge pin and latch protection as emergency doors.

7. **Roll up/delivery doors-** All roll up and delivery doors will be constructed of medium to heavy gauge metal that will prevent a person from easily gaining access to the building without the use of heavy tools. Roll up and delivery doors will be constructed in a way that they may only be opened from the interior of the business. All shipping/receiving areas shall be secured with a sally port type area.
8. **Dispensary access-** Customers will enter the exterior door where their government issued ID and membership will be verified and recorded in an access log by a security guard or employee. Once the customer has been verified, the security guard or employee will allow the customer to enter the dispensary through a secondary door. At no time will customers be allowed anywhere behind the sales counters or any area other than the sales floor or area designated and approved for customer access. Vendors will be limited to the sales floor area unless directly escorted and supervised by an employee at all times. Doors located behind the counter leading to secure areas within the business should be solid core wooden or substantial metal doors with no windows.
9. **Cultivation/Processing/Manufacturing/Testing facility access-** Access to buildings, areas, or sites where cannabis is being cultivated, processed, manufactured or tested will be limited to company employees, vendors\*\*\*, and visitors. Access to these areas and buildings will be controlled by a two stage access point. This will be accomplished by

either entering through an exterior door into a lobby area before entering the more secure interior area or by access through a controlled gate before entering the more secure entry/exit door. Vendors and visitors must be escorted and supervised by an employee at all times. No one under the age of 21 years old will be allowed into the facility or behind the secured fence.

10. **Exterior lighting-** All exterior lighting shall illuminate the entire property so there are no dark or shadowy areas surrounding the buildings or fencing. Exterior lighting shall illuminate the entire property extending out to the property/fence lines. Lighting shall be sufficient foot-candles to illuminate the entire property to allow ready identification of any persons on the property at a distance of no less than forty (40) feet. If a timing system is used to turn on and off the exterior lights, special care shall be used to ensure the lights turn on at dusk and off at dawn. Exterior lighting will comply with FAA rules and regulations.

- **ID Cards:**

1. All subjects \*\*\*\* will wear a color coded ID badge at all times while on any property currently cultivating, processing, manufacturing, selling, testing, or dispensing any cannabis or cannabis related products. ID badges will be worn in plain view above the waist at all times while the person is anywhere on the cannabis facility property. ID badges will be issued to personnel upon completion of their livescan fingerprinting. All ID badges issued to employees by the City of Hollister are the property of the city and may be revoked at any time. ID badges issued to personnel who are no longer employed by a facility shall be immediately turned into the Chief of Police or his representative. Each facility will provide the police department representative with a list including each employee's name, DOB, job title or duty, and level of access. Missing or lost badges will be immediately reported to the police department representative. A replacement fee can be accessed by the City of Hollister to the company for each missing or lost badge.
2. Employees/Management staff whose job duties require them to have full access to all areas of the facilities areas shall be issued a red "FULL ACCESS" badge. Subjects possessing a red badge can have access to any and all areas of the facility. Each badge will have the employee's photo, name, DOB, unique ID number, and level of access printed on it.
3. Employees whose job duties only require them to have access to limited areas within the facility shall be given a yellow "LIMITED" badge. Each badge will have the employee's photo, name, DOB, unique ID number, and level of access printed on it.
4. Vendors \*\* shall be issued a numbered blue "VENDOR" ID badge by the access control person for each facility. Vendors will not be allowed anywhere in the secure employee

only areas of any facility without an employee escort. An escort shall remain with the vendor during the entire time they are on the facility grounds. The access control person will retain the vendor's government ID while the vendor is in possession of the vendor ID badge and will return the government ID upon receipt of the vendor ID badge. The vendor's government issued ID card information to include their name, DOB, government issued ID number, company represented, and reason for visit shall be logged into the access control log. Vendors will be logged out of the access control log and their badge returned to the access control person upon leaving the facility. Each facility will be issued no more four (4) "VENDOR" ID badges.

5. Dispensary customers inside a dispensary lobby/sales area will not be required to have any badge. Customers will only be allowed in the public access lobby and sales areas.
6. Visitors\*\*\* will not be allowed anywhere in the secure employee only areas of any facility without an employee escort. This escort shall remain with the visitor during the entire time they are in the facility. The access control person will retain the visitor's government ID while the vendor is in possession of the visitor ID badge and will return the government ID upon receipt of the visitor ID badge. Each visitor's government issued ID card to include their name, DOB, government issued ID number, and reason for visit shall be logged into the access control log. Each visitor shall be issued a numbered green "VISITOR" ID badge. Each badge will be collected by the access control person when the visitor leaves the facility and the log updated to reflect the time the visitor left. Each facility will be issued no more four (4) "VISITOR" ID badges.
7. No employee or management staff will be allowed to perform any work or be present in non-public access areas without their assigned ID badge.
8. Persons with City of Hollister issued/owned badges shall present the badge to any police department representative upon demand.
9. Government officials, other than public safety and without a city issued badge, shall be logged into the access control log and will be issued a visitor badge. Government employees who are on the premise for official business shall be given priority over non-government visitors in the event of limited badges.

- **Security Personnel:**

1. The number of uniformed security personnel required at each facility will be dependent upon the unique characteristics of that facility. Each security guard shall be equipped with personal protective equipment to include less lethal options. This will be any combination of no less than 2 of the following; pepper spray (OC spray), baton, or ECD. Security guards will also carry the following on their person at all times; handcuffs,

flashlight, and a two-way radio with clear communication to central dispatch or working cell phone. Each guard will be licensed and possess the appropriate Department of Consumer Affairs “Security Guard Card” and license for each weapon they are carrying. The number and type of security guards for each facility will be approved by the police department representative. All logs and reports generated by any security guard shall be made available to any police department representative without any court order, subpoena, or warrant.

2. Each facility shall have no less than one uniformed security guard on duty on premises during anytime there are employees and cannabis or cannabis products present.
3. Each dispensary shall have no less than one uniformed, armed, security guard present at the front door anytime cannabis or cannabis products are presented for sale.
4. Each facility shall provide the police department representative with the names and contact information for three security liaisons. One contact must be an individual available to respond and be on site at the facility within twenty (20) minutes of being called and have the ability to give access to all areas of the facility in case of any alarms. One contact may be a central dispatch for the security company providing the security service.
5. Each oncoming security guard will conduct a security sweep and inspection of their area of responsibility at the beginning of their shift. They will maintain a log of any deficiencies and what corrective actions were taken. This log will be maintained for a period of no less than one month and shall be made available to any police department representative upon demand.

- **Inventory Control:**

1. All incoming, produced, outgoing, sold, and destroyed products shall be inventoried and tracked. Each facility shall ensure the police department has the means necessary to read/interpret their inventories and tracking systems. These reports and/or inventories will be made available to the police department representative without the need for a court order, subpoena, or warrant. All records shall be kept on site at each facility for no less than 6 months.
2. Any display, returned, damaged, unsealed, or adulterated products shall be destroyed in a manner keeping with the destruction requirements. These items will not be sold, given away, donated, or kept by employees for any reason.
3. All destroyed items and waste products shall be kept within the secure area (exterior fence) of the facility in a manner so they can not be seen or smelled by anyone outside

of the facility. They shall remain within the secure area until they are picked up by a cannabis waste handling company and transported to their facility.

4. All destroyed items and waste products shall be processed into a matter so that it no longer resembles (sight, smell, taste) any cannabis product.
5. All cannabis and cannabis products shall enter and exit each facility through a secure doorway prearranged with the police department.

- **Delivery drivers and vehicles:**

1. All vehicles used to transport any cannabis, cannabis products, or cannabis waste shall be equipped with a GPS that tracks the vehicle's location and route in real time. GPS information will be stored on a secure server at the facility which the vehicle is dispatched/originates from. All GPS data will be made available to the police department representative immediately upon demand without the need for a court order, subpoena, or warrant. All GPS information shall be kept on site at the facility for no less than 3 months.
2. All vehicles will be equipped with no less than two (2) cameras. One camera shall face forward out the front windshield while a second shall be mounted in a location that will capture the driver's compartment and driver's window area.
3. Cameras shall be recording continuously anytime there is cannabis, related products, facility money, or cannabis waste products inside or on the vehicle.
4. Cameras shall record in no less than 720p resolution.
5. Each facility shall maintain a system that allows the making of video recordings onto a USB drive and will make those recordings for the police department representative upon demand without the need for a court order, subpoena, or warrant.
6. The vehicle recording system will be downloaded to the home facility video server once the vehicle has made its last delivery or pick up for the day. All vehicle recordings shall be maintained in the same manner as facility security videos.
7. Recordings shall be handled and maintained in a way that prevents any tampering by employees.
8. Vehicles will not have any signage or advertisement on them that would identify them to the general public as being related to the cannabis industry or as a delivery vehicle.
9. All delivery vehicles will be open to stop and inspection by any peace officer at any time with or without cause, subpoena, court order, or warrant.

10. All cannabis and cannabis related products (except waste) shall be stored in the vehicle in a locked container approved by the police department. The container shall be either secured to the vehicle or locked to the child restraint system in a way that prevents the theft of the container without the use of heavy or cumbersome tools.
11. All vehicles used for delivery or transportation of waste shall be currently registered and insured in compliance with the California Vehicle Code (CVC).
12. All drivers shall be licensed in compliance with the CVC and shall carry their driver's license, City of Hollister ID badge (not visible while driving), vehicle registration, and insurance at all times while driving.
13. Dispensary drivers shall not have more than \$3,000.00 worth of product, cash, or any combination thereof in the vehicle with them at any time.

- **Site, Facility, Vehicle, and Personnel Inspections:**

1. Any site, facility, place, property, or vehicle involved in the cultivation, processing, manufacturing, testing, sales, giving away, donating, or transporting of cannabis, cannabis related products, or cannabis waste shall be inspected regularly by a police department representative.
2. Inspections will be conducted randomly, at will, and without prior notice to the area, site, facility, place, property, person, or vehicle to be inspected.
3. Police department inspectors shall be given immediate and full access to any and all areas of any buildings, properties, or vehicles.
4. An updated criminal history check will be completed for each employee by the police department in accordance with their annual permit renewal. Each employer shall provide the police department representative with the list of employees to include their name, DOB, and government ID number.

- **Hours of Operation:**

1. Cultivation, manufacturing, processing, and testing facilities may operate 24 hours a day so long as their operations are not a nuisance to the surrounding businesses.
2. Dispensaries shall not be open for business nor have any customers inside the premise between the hours of 9:05 PM and 7:00 AM. Dispensaries shall not sell, give away, or donate any cannabis or cannabis related products between the hours of 9:00 PM and 7:00 AM.



3. No delivery driver shall make any delivery of any kind to any patient or caregiver between the hours of 9:00 PM and 7:00 AM.

- **Security Cameras and Video Retention:**

1. Exterior video cameras will be installed so they capture all sides of every building involved in the cultivation, processing, manufacturing, sales, or dispensing of cannabis or cannabis related products. Cameras will be placed at locations and angles so as to clearly capture the face and ID badge of every person entering or exiting the building. For locations with driveways/vehicle entrance/exit points, cameras will be installed at a location and angle that allows it to capture the rear license plate and vehicle description of every vehicle that enters or exits.
2. At a minimum, a licensed premise shall have a digital video surveillance system with a minimum camera resolution of 1280 × 720 pixels.
3. The surveillance-system storage device or the cameras shall be transmission control protocol (TCP) capable of being accessed through the internet. The video system shall be compatible with a player system of the police department's choosing.
4. Areas that shall be recorded on the video surveillance system include, but are not limited to, the following:
  - Areas where cannabis goods are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the premises;
  - Limited-access areas;
  - Security rooms;
  - Areas storing a surveillance-system storage device with at least one camera recording the access points to the secured surveillance recording area; and
  - Entrances and exits to the premises, which shall be recorded from both indoor and outdoor vantage points.
5. Retailers shall also record point-of-sale areas and areas where cannabis goods are displayed for sale on the video surveillance system. At each point of sale location, camera placement must allow for the recording of the facial features of any person purchasing or selling cannabis goods, or any person in the retail area, with sufficient clarity to determine identity.
6. Cameras shall record continuously 24 hours per day and at a minimum of 15 frames per second (FPS).
7. The physical media or storage device on which surveillance recordings are stored shall be secured in a manner to protect the recording from tampering or theft.

8. Surveillance recordings shall be kept for a minimum of 90 days.
9. Recorded images shall clearly and accurately display the time and date. Time is to be measured in accordance with the United States National Institute Standards and Technology standards.
10. The video surveillance system shall be equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the video surveillance system or video surveillance-system storage device.
11. Cameras will be placed and angled so every square foot of exterior space can be clearly seen and monitored. Cameras are to be weather and tamper proof with no exposed wiring that would allow a person to easily cut or sever the wires/feed.
12. All cameras and recording systems must be of adequate quality, color rendition, and resolution to allow the ready identification of anyone on, or in, the property and facility.
13. Interior cameras shall be placed at locations and angles so there are no “dead” spaces within the buildings and so the movement of personnel can be easily tracked and their ID badge clearly seen.
14. Final placement and approval of all cameras will be at the discretion of the police department. All cameras shall be recording at all times. The use of motion activated cameras will not be authorized or counted towards the police department approved minimal camera requirements.
15. All camera feed/video shall be viewable by any police personnel via a live/real time feed and all video shall be retained on site at the facility with a redundant storage of the video kept at another, secure facility or means.
16. All video systems must be compatible with a player of the police department’s choosing. Each facility/company will pay all associated licensing fees and costs to ensure the police department is able to view live feed of all cameras from their remote location.
17. Each facility shall have the means to make copies of any videos onto a USB drive type device. Any and all security recordings shall be immediately made available and given to any police department representative upon request without the need for a court order, subpoena, or warrant.

- **Violations:**

1. Any violations of this safety plan will be considered a violation of the operating permit and can result in a revocation of the operating permit and/or a letter of correction with an immediate correction date and associated fines.
2. Seized cannabis and cannabis related products will not be stored in any manner as to preserve them in any form. Cannabis and cannabis related products not claimed after 90 days following any appeals or court proceedings will be immediately destroyed.
3. The Hollister police department, it's employees, or the City of Hollister are not liable for any damages caused or any loss of revenue associated with any actions covered under the provisions of this safety plan, the City of Hollister Municipal Code, or state or federal law. This includes, but is not limited to, inspections, investigations, removal and storage of items, civil penalties, license suspensions/revocations, or legal prosecution.
4. The City of Hollister, the Hollister Police Department, and their designated representatives maintain the right to deny, revoke, or suspend any permit for any violation of this safety plan, the Hollister Municipal Code, or any state or federal laws.

\*Cannabis related movement includes, but is not limited to, the loading or offloading of transport vehicles including all types of delivery vehicles and waste transportation vehicles, any stage of preparation, cultivation, processing, manufacturing,

\*\*A vendor is a person who is engaged in selling or buying of cannabis, cannabis related products, business supplies, or products/services needed for the cultivation, manufacturing, processing, or sales of cannabis/products at more than a personal use amount.

\*\*\* A visitor is anyone who is visiting the facility for purposes other than a vendor and is not an employee of the facility or government entity on official business.

\*\*\*\* Public safety personnel engaged in official duties wearing the approved uniform or clothing of their office will be exempt.