



## Police Department

### Pre-Applicant Security Plan Expectations

Depending on the type of cannabis business you are considering, there may be various security requirements from both the State of California and the City of Benicia. To assist you in providing a reasonably complete security plan for consideration in your pre-application, we encourage those engaging the pre-application process to ensure that their conceptual security plan, at minimum, demonstrates adherence the following expectations. The list that follows has been developed in accordance with State law and the City of Benicia's accepted best practices for security related to commercial cannabis operations:

#### **Premises Diagrams (applicable to all cannabis uses):**

In addition to those items enumerated below by license type, any and all to-scale premises diagrams submitted for Police Department review should identify:

- All exterior access points (doors, roll-up doors, windows, vents/ducts). Target hardening measures for each should be described (in narrative format or by way of legend details on the diagram).
- All interior control points (doors). Diagram legend should indicate which doors require credentials (show hierarchy where applicable) and type (access code, card, fob, key or biometric controls);
- The purpose (by label) of each interior room/closet with sufficient detail to make clear what activities will occur in each room. Avoid generic terms such as "office" or "storage". Specificity is required;
- Doors that require employee level access credentials (card/fob/key/biometric) to access;
- Exterior fencing and gates, where applicable, indicating if electronically controlled or manual;
- Placement of Knox box(es) for emergency services access to the premises;
- Alarm components (contacts, motion detectors, glass break sensors, panic/duress alarms and panels);
- Surveillance cameras (placements, viewing angles, camera number, megapixel rating);
- Digital Video Recorder location (secure, management-only area);
- Secure records storage (free of vermin, dust, debris, moisture);
- Limited access, public and common/shared areas (where co-located licenses are proposed);
- Secure cannabis waste storage;
- Secure screening lobby (unmanned area or demonstrating first contact protection measures);
- Secure loading area (exclusive to licensee);
- Secure product storage (describe target hardening measures);
- Secure currency storage (describe target hardening measures);
- Employee break/restroom/locker areas;
- Employee parking areas;
- Landscaping that promotes natural surveillance, video surveillance and light flow (photos encouraged); and
- Exterior security lighting placements, fixture specifications, existing or anticipated photometric results.

**Additional Details (applicable to all cannabis uses):**

In addition to those items enumerated below by license type, the conceptual security plan should address/describe:

- Use of uniformed private security officers (armed, unarmed, number, coverage hours, etc);
- Use of uniformed private patrol services (frequency, call/alarm response, armed/unarmed, etc);
- Pre-employment criminal background screening of employees, frequency of recurring checks;
  - Reporting of discovered convictions and licensee response to discoveries;
- Personnel training relevant to robberies, burglaries, theft/diversion (content, frequency, testing);
- Loading/Unloading protocols;
- Inventory accounting;
- Records protection (hard copy and electronic);
- Loss, breach or crime reporting and investigations;
- Currency transfer protocols;
- Opening and closing procedures;
- Access control protocols, visitor management;
- Employee identification management and display;
- Management of access control credentials (if not biometric);
- Contingency plans (power outage, natural disaster, etc);
- Description of surveillance system (features, archives, access, protection, maintenance);
- Description of alarm system (features, access, auditing, protection, maintenance);
- Description of access control system (features, access, auditing, protection, maintenance);
- Identity/qualifications of “Security Director” and assigned responsibilities;

**For Cultivation Businesses:**

In accordance with California Code of Regulations, Title 3, Division 8, Chapter, Section 8340(C), provide a description of exterior security lighting that will be employed, ensuring that it is shielded against light trespass, up-lighting and is downward facing. Provision of a photometric plan demonstrating the anticipated illumination during hours of darkness is encouraged, as are the manufacturer’s specifications of the intended fixtures to be used.

In accordance with California Code of Regulations, Title 3, Division 8, Chapter 1, Section 8106, the to-scale premises diagram provided should identify the following:

- Canopy area(s), including aggregate square footage if the canopy areas are noncontiguous;
- Area(s) outside of the canopy where only immature plants shall be maintained;
- Designated pesticide and other agricultural chemical storage area(s);
- Designated processing area(s) if the licensee will process on site;
- Designated packaging area(s) if the licensee will package products on site;
- Designated composting area(s) if the licensee will compost cannabis waste on site;
- Designated secured area(s) for cannabis waste;
- Designated area(s) for harvested cannabis storage;
- Designated area(s) for physically segregating cannabis subject to an administrative hold;
- Designated area(s) that are shared between licenses held by one licensee, if applicable; and
- In accordance with California Code of Regulations, Title 3, Division 8, Chapter 1, Section 8400(e)(2), a designated secure records storage area.

**For Manufacturing Businesses:**

In accordance with California Code of Regulations, Title 17, Division 1, Chapter 13, Section 40105, the to-scale premises diagram provided should identify:

- If the proposed premises consists of only a portion of a property, the diagram shall be labeled to indicate which part of the property is the proposed premises and identify what the remaining property is used for;
- All boundaries, dimensions, entrances and exits, interior partitions, walls, rooms, windows, and doorways;
- Labeling of all areas where infusion activities, extraction activities, packaging activities, labeling activities, and loading/unloading activities will occur;
- The limited-access areas, areas used for video surveillance monitoring and surveillance system storage devices, and all security camera locations (see Section 40205):
  - Digital video surveillance system with a minimum camera resolution of 1280 × 720 pixels, continuously recording 24 hours per day at a minimum frame rate of 15 frames per second with a 90 day retention period of all footage;
  - Professionally installed in a manner that prevents obstruction, tampering with, or disabling;
  - Areas that shall be recorded on the video surveillance system include areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and unloaded for transportation, prepared, or moved within the premises, limited-access areas, interior and exterior vantage points of each entrance and exit to the premises, and security rooms;
  - Surveillance storage devices shall be located in secure rooms equipped with described access control measures and at least one camera recording its access point;
  - Video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute of Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images;
  - Premises diagram must identify where the surveillance recordings are stored;
- Cannabis waste disposal areas;
- If the proposed premises consists of only a portion of a property that will contain two or more licensed premises, the diagram shall clearly show any entrances and walls under the exclusive control of the applicant or licensee. The diagram shall also show all proposed common or shared areas of the property, including entryways, lobbies, bathrooms, hallways, and breakrooms.

In accordance with California Code of Regulations, Title 17, Division 1, Chapter 13, Section 40131(j) the conceptual security plan should:

- Describe the inventory control procedures (see Section 40282);
- Describe the transportation process including how cannabis or cannabis products will be transported into and out of the premises;
- Describe security procedures sufficient to demonstrate how the applicant will comply with the requirements of Section 40200:
  - Describe physical barriers to secure perimeter access and all points of entry into a manufacturing premises (e.g. fencing, doors, locks, etc);
  - Describe the monitored, UL listed, security alarm system to notify and record incident(s) where physical barriers have been breached. The provided premises diagram should, at

minimum, identify intended placements of motion detectors, door contacts, glass break sensors, control panels and duress/robbery alarm trigger points.

- Describe the identification and sign-in/sign-out procedure for authorized personnel, suppliers, and visitors;
- Describe how maintenance of the premises will provide for natural surveillance, visibility and security monitoring of the premises;
- Describe the procedures for the investigation of suspicious activities on/about the premises;
- Describe measures to protect against theft or loss of cannabis and cannabis products. This includes but is not limited to:
  - Description of the inventory system used to track cannabis and cannabis products and the personnel responsible for processing it throughout the manufacturing process;
  - Describe procedures for limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties, including access by outside vendors, suppliers, contractors or other individuals conducting business with the licensee that requires access to the premises;
  - Describe the supervision strategies relating to those tasks or processes with high potential for diversion, including the loading and unloading of cannabis transportation vehicles; and
  - Describe (and identify on the premise diagram) where and how employees may store and access personal items that are prohibited from entering the manufacturing areas.
  - Describe (and identify on the premise diagram) how hard-copy and electronically backed up records will be stored in a manner that prevents unauthorized access and that ensures the integrity of the records is maintained

### **For Distribution and Laboratory Testing Businesses:**

In accordance with California Code of Regulations, Title 16, Division 42, the conceptual security plan should address/describe:

- Vehicle security (product/currency storage, GPS tracking, driver communications/duress, alarms, etc).
- Protocols regarding off-premises vehicle breakdowns and related product protection;
- Counter or similar infrastructure should be identified on the premises diagram for batch sampling (distributors);
- Logging of all non-employees accessing a designated limited access area (Section 5042);
- Solid core doors with commercial grade locks at each limited access area access point (Section 5042);
- Employee badges, including content and management/security of badges (Section 5043);
- Video Surveillance (Section 5044), including:
  - A minimum camera resolution of 1280 × 720 pixels, or as necessary to produce interior images with a target resolution of 80 pixels per foot and exterior images with a target resolution of 100 pixels per foot;
  - Each camera shall be permanently mounted and in a fixed location. Each camera shall be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises, and allows for the clear and certain identification of any person and activities in all areas recorded;

- Areas that shall be recorded on the video surveillance system shall include all areas where cannabis goods are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises, all limited-access areas, all rooms containing security controllers, all areas storing a surveillance-system storage device with at least one camera recording the access points to the secured surveillance recording area; and all entrances and exits to the licensed premises, which shall be recorded from both indoor and outdoor vantage points.
- Cameras shall record continuously 24 hours per day and at a minimum of 15 frames per second (FPS).
- 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.
- Surveillance recordings shall be kept for a minimum of 90 calendar days.
- Surveillance recordings are subject to inspection and shall be kept in a manner that allows authorities to view and obtain copies of the recordings at the licensed premises immediately upon request. A viewing/offloading area should be identified on the premises diagram.
- Recorded images shall clearly and accurately display the time and date. Time is to be measured in accordance with the standards issued by the United States National Institute of Standards and Technology.
- 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.