

TOWN OF WAYLAND

MASSACHUSETTS 01778

PLANNNING BOARD

TOWN BUILDING 41 COCHITUATE ROAD TELEPHONE: (508) 358-3778

APPLICATION FOR HEARING

LOCATION OF SUBJECT PROPERTY			
526C, 526D, 526E, 526F Boston Post Road	21	008C, 008D, 008E, 00	8F <u>1987</u>
# and Street Name	Plate	Parcel	Year Built
ZONING INFORMATION			
Limited Commercial		Medical Marijua	ana District
Zoning District Office condominiums		Ove Medical Mar juan	rlay District a Treatment Center
Present Use	 0		posed Use
OWNER INFORMATION			
HDR Holdings LLC		617	-934-2121
Name PO Box 70, Wayland, MA 01778		Tele	ephone Number
Address			
34165 0115 Book, Page;	orla	nd Court Cert. No.	
APPLICANT INFORMATION (if differen	-	Maria de la companiona dela companiona della companiona della companiona della companiona d	
Earth Well Farms, LLC		617	-934-2121
Name		Tele	phone Number
526 Boston Post Road, Wayland, MA 01778 Address			
Address			
ATTORNEY/AGENT INFORMATION (if	applicable)		
Vicente Sederberg LLP		617	-934-2121
Name	*** 00400	Tele	phone Number
Prudential Tower, 800 Boylston Street, 26th Floor, Bosto Address	on, MA 02199		
NARRATIVE (describe proposal)			
Please see the enclosed project narrative.			
riease see the enclosed project namative.			
			-9

I hereby request a hearing before the Planning Board with reference to the above application, with supporting documentation submitted, and that the proposed work is authorized by the Owner of Records and I have been authorized by the owner to make this application as the agent. 7 Jan 2022 Authorized Agent/Owner I have submitted nine (9) sets, each including the following: ✓ Application ☑ Certified Plot Plan ☑ Schematic Architectural Plans ☐ Board of Health Approval ✓ Narrative Miscellaneous Additional Information\ **OFFICE USE ONLY:** ☐ Special Permit ☐ Scenic Road Permit Aquifer Protection Special Permit Other Applicable Sections on Zoning By-Laws: Comments: Received and Recorded by the Town Clerk: Reviewed by: Date: Fee Paid: Signature of Town Clerk



TOWN OF WAYLAND CHECK LIST FOR APPLICANTS SITE PLAN REVIEW AND APPROVAL

526A Boston Post Road:
Project Medical Mar juana Treatment Center

Date of Staff Review

Application Submittal Requirements*	Applicant Yes-No-N/A	Town Staff Verification	Town Staff Comments
Application Form C	Yes		
Application for site plan review and approval.	163		
List of requested waivers. Requests, submitted with application, shall include a statement that identifies the provision(s) of these regulations from which relief is sought and the reason(s) why, the granting of each waiver(s) would be in the public interest and not inconsistent with the intent and purpose of the Zoning Bylaws and these regulations.	N/A		
Site Plan to Include:			
One original and ten (10) complete sets of 24"x36"plan, clearly and legibly drawn, and suitable for recording.	Yes		
One 11"x17" reduced copy	Yes		
Title Block - The cover sheet shall include an appropriate title block.	Yes		
Space shall be provided for endorsement, including the date, with the caption "Date Site Plan Endorsed:"			
Name and Address of owner(s)			
Developer and/or designer			
Engineer and/or surveyor	Yes		
Lot(s)/Parcel(s) no. & Tax Map No.	Yes		
Date	Yes		
Site plan to show the following general characteristics			
The locus at a scale of one inch equals 1,000 feet for a minimum radius of 1/2 mile centered on the site.	Yes		
On each plan sheet, a legend identifying any representative symbols used on said plan sheet.	Yes		
Lot lines and boundaries of the site, with permanent bounds, and abutters with their property lines indicated.	Yes		
Existing and proposed easements.	Yes		
Existing and proposed internal and adjacent private and public rights- of-way, edges of pavement and other surface and subsurface features within said rights-of-way.	Yes		
Zoning districts (including the Floodplain, Aquifer Protection and Watershed Protection Districts).			
Existing and proposed topography at two-foot intervals, referenced to the National Geodetic Vertical Datum, with the location and elevation of the permanent benchmark, plus at least two additional permanent benchmarks on the site.	Yes		
Areas intended for use as open space.	Yes		
Wetlands and wetland buffers, as defined in MGL c. 131, § 40.	N/A		
Watercourses and water bodies, including ponds, streams, brooks and ditches.	N/A		
Special site features, including stonewalls, fences, historic structures, ledge outcroppings, large trees, etc.	N/A		
Areas of lots with lot numbers and areas of adjoining land not included in the subdivision	Yes		
Suitable space to record the action of the Planning Board and the signatures of the members of the Board	Yes		
Soil classification as shown on the USDA – SCS Soil Survey Map	N/A		

^{*} This check list is for guidance only. Submittal of all the identified materials does not constitute a complete application or compliance with regulations. Please consult Article 6 of the Town of Wayland Zoning Bylaw and the Planning Board's Site Plan Review and Approval Regulations for submittal requirements.

	T	
Site plan shall show all of the following site improvements on or related to the site		
The outline or footprint of existing and proposed structures.	Yes	
Elevations of the front, sides and rear of existing and proposed	N/A	
structures, with maximum heights indicated.		
Floor plans of existing and proposed structures, with an indication of		
the use or uses intended for each floor in question and an indication of	Yes	
the net floor area for each use. Setbacks for existing and proposed structures and parking and loading		
facilities.	Yes	
Existing and proposed signs.	Yes	
Areas intended for outdoor storage, indicating whether fenced or		
enclosed.	Yes	
Underground storage containers for fuel or other chemical storage,		
including type and capacity of each container.	N/A	
Existing and proposed sidewalks, walkways, driveways and accesses to	Vec	
the site.	Yes	
Existing and proposed parking and loading facilities, including any	Yes	
proposed landscaped areas within the perimeter of a parking facility.		
Parking spaces must be identified as standard size, compact size or		
handicap and shown on the plan. The plan must show at least one parking space of each type provided. Areas proposed for reserve		
parking shall be identified.		
Materials to be used in the construction of impermeable surfaces shall	Yes	
be noted on the plan, with specifications for construction consistent	165	
with those set forth in the Subdivision Regulations of the Planning		
Board.		
The plan shall show all of the following site utilities on or		
related to the site.		
Stormwater drainage facilities by type, including construction materials	N/A	
of pipes, culverts, catch basins and other system components. Sufficient		
information relating to the placement of drainage system components (rim and invert elevations, pipe slopes and amount of cover) shall be		
provided to evaluate the system. Any proposed drainage ponds shall be		
depicted.		
Devices to control erosion and sedimentation during and after		
construction.	N/A	
Water service facilities by type. If on-site wells are to be used, their	N/A	
proposed location and distance from structures and sewage disposal		
systems must be shown. If public water is to be used, the water main		
serving the site must be identified, sized and its location shown.		
Fire hydrants on the site or off the site but within 500 feet of the principal structure on the site. If there is no hydrant within 500 feet of		
the principal structure on the site, the applicant shall indicate how fire		
protection is to be provided for the site. The location of proposed fire		
alarm boxes or other warning system and fire lanes shall be provided.		
Underground utilities.	N/A	
Solid waste disposal facilities by type.	Yes	
Proposed and existing on-site sewage disposal systems, including		
required reserve areas, and the locations of water mains with respect to		
said systems. If a sewage treatment plant is proposed, its location and		
those of water mains must be shown.		
The plan shall show typical details, profiles and/or cross		
sections, with slopes, dimensions, curves, etc., for all of the		
following construction features on or related to the site:		
Rights-of-way, catch basins, manholes, headwalls, sidewalks,		
walkways, driveways, parking and loading areas, sub-drains, waterways, leaching basins, drainage ponds, etc.	Yes	
water ways, reaching basins, dramage ponds, etc.		

Tree wells, tree plantings and specialty planting areas.	Yes
Each type of parking space.	Yes
Outdoor structures, including lighting fixtures, signs, etc.	Yes
Erosion, sedimentation and other construction and pollution control devices.	N/A
The plan shall show all of the following landscaping details on	
or related to the site:	
Buffer areas, with plantings detailed by common name of species, height (at planting), spread (at maturity) and quantity to be planted.	N/A
The perimeter of existing wooded areas, with those wooded areas to be preserved indicated.	N/A
Tabulations of building coverage, open spaces, wooded areas, etc.	Yes
Written submittals (see § 302-22 subsection D)	
Drainage calculations used to support the design of the stormwater drainage system.	N/A
Water Resource Impact Analysis and Mediation Report. See section	N/A
A description and analysis of design features intended to integrate the proposed new and altered buildings, structures, signs and plantings into the existing landscape to preserve and enhance aesthetic assets of the site and to screen objectionable features from adjacent properties shall be submitted.	N/A
Traffic study	Yes
A description and analysis of proposed waste disposal practices and their impacts.	Yes
Other information as submitted by Applicant or required by the Planning Board.	

SITE PLAN REVIEW AND APPROVAL

Supplemental SPA Form A Supplemental Site Plan Information

1.	Na	ame, address and telephone number of applicant(s):				
	52	arth Well Farms, LLC 26 Boston Post Road, Wayland, MA 01778 7-934-2121				
2.	Na	ime, address and telephone number of owner(s) of record (if different from applicant):				
	H	HDR Holdings LLC PO Box 70, Wayland, MA 01778 617-934-2121				
3.	Ad de	dress, name, title, description and/or other identification of proposed velopment/activity sufficient to locate the site on the ground and in the town's files:				
	5	26C, 526D, 526E, 526F Boston Post Road, Wayland, MA 01778				
4.	Ge	neral information:				
	a.	Recording information for deed(s) of property (recorded in the South District Middlesex Registry of Deeds and/or Land Court; include copies of deeds):				
		Book 34165 , page 0115 ; or Land Court Cert. No Book, page; or Land Court Cert. No Book, page; or Land Court Cert. No				
	Ь.	Zoning district(s), and acreage for each district, in which the site is located:				
		Zoning district: LC ; Acreage: Zoning district: Town of Sudbury; Acreage: Zoning district: ; Acreage:				
	c.	Information from Assessor's office:				
		Map No. 21 ; Lot No				
	d.	Brief description of property locus and surrounding properties (include list of abutters):				
		Please see enclosed narrative.				
5.	His	tory of the use of the site:				
	a.	Past uses, as researched from readily obtainable sources (cite sources):				
		The current property owner reports that the property has been used for office condominiums since 2001.				
	b.	Present use(s): Office condominiums.				
	c.	All zoning variances granted, listed chronologically by case number, with brief description:				
		Not applicable.				

WAYLAND CODE

6.	a.b.c.	Not applicable. If any part of the site is protected as a nonconforming use or structure, describe: Not applicable. sting site characteristics: Total acreage of site: 3.276 acres Total acreage in Floodplain District:; % of total acreage: Total acreage in Aquifer Protection District:; % of total acreage:
6.	Exi a. b. c.	Not applicable. sting site characteristics: Total acreage of site: 3.276 acres Total acreage in Floodplain District:; % of total acreage:
6.	a.b.c.	Total acreage of site: 3.276 acres Total acreage in Floodplain District:; % of total acreage:
	b. с.	3.276 acres Total acreage in Floodplain District:; % of total acreage:
	C.	
		- 3 of total acreage.
	d.	Total acreage in Watershed Protection District: 0; % of total acreage:
	e.	Total acreage in wetlands and wetland buffer areas, as defined by MGL c. 131, § 40:
		Wetlands: 0; % of total acreage:
		Buffers:; % of total acreage:
	f.	Total acreage of legally dedicated open space:; % of total acreage:;
7.	Exis	sting and proposed site improvements:
	a.	Existing structures, with name and total square footage of footprint and gross floor area of each:
		Name: Existing building; Footprint area: 21,407 SF; Gross floor area: 21,407 SF
		Name:; Footprint area:; Gross floor area:;
		Name:; Footprint area:; Gross floor area:;
	Gran	d totals: Footprint area: 21,407 SF ; Gross floor area: 21,407 SF
	b.	Proposed structures, with name and total square footage of footprint and gross floor area of each: No changes proposed.
		Name:; Footprint area:; Gross floor area:;
		Name:; Footprint area:; Gross floor area:;
		Name:; Footprint area:;

SITE PLAN REVIEW AND APPROVAL

	Gross floor area:				
Gr	and totals: Footprint area:; Gross floor area:;				
c. Total square footage and number of spaces by type of existing parking:					
	Area:; Spaces: 193				
d.	Total square footage and number of spaces by type of proposed parking: No changes proposed. Area:; Spaces:				
e.	Describe existing and proposed materials used for any impermeable surfaces: No changes proposed. Please see narrative.				
f.	Describe existing and proposed access to the site:				
	No changes proposed. Please see narrative.				
8.	8. Have sewage disposal and drainage impacts been filed with Board of Health? If no explain, including date to be filed. If yes, attach copy of said filing and summariz said impacts here:				
	No changes proposed.				
Signatur	re(s) and printed name(s) of applicant(s):				
	Date:				
	Date				
	Date:				
Signatur	re(s) and printed name(s) of owner(s) of record, if different:				
	Date:				
	Date:				
	Date:				

SITE PLAN REVIEW AND APPROVAL

SPA Form C Application for Site Plan Review and Approval

Application is hereby made for site plan review and approval under the Zoning Bylaws, Article 6. As required by the Site Plan Review and Approval Regulations, § 302-16B, the applicant shall submit one original and 10 copies of this Form C at the Planning Board office, together with one original and five copies of all plans and other required materials. One copy of this Form C shall be filed at the Town Clerk's office at the time of said submittal, with a receipt for said filing included as part of the Planning Board submittal. The information on this Form C shall be shown on the site plan. Attach additional pages if necessary.

l.	Name, address and telephone number of applicant(s): Earth Well Farms, LLC 526 Boston Post Road, Wayland, MA 01778				
2.	617.934.2121 Name, address and telephone number of owner(s) of record (if different from applicant): HDR Holdings LLC PO Box 70, Wayland, MA 01778				
3.		934.2121 ne, address and telephone number of design engineer(s)/surveyor(s)/architect(s):			
	Engi Arch	ineer: Fuss & O'Neill, Inc; 190 High Street, Boston, MA 02110; 617-282-4675 hitect: BKA Architects; 142 Crescent Street, Brockton, MA 02302			
1.	Nar	ne, title and/or other identification of proposed development/activity:			
	Earth	n Well Farms, LLC - Medical Mar juana Treatment Center			
5.	Oth	er information:			
	a.	Recording information for deed(s) of property recorded in the South District Middlesex Registry of Deeds and/or Land Court (include copies of deeds):			
		Book 34165 , page 0115 ; or Land Court Cert. No Book, page; or Land Court Cert. No			
	b.	Zoning district(s), and acreage for each district, in which the site is located:			
		Zoning district: LC; Acreage: 2.15 Zoning district: Town of Sudbury; Acreage: 1.13 Zoning district: Acreage: ; Acreage: ; Acreage:			
	c.	Information from Assessor's office:			
		Map No. 21 ; Lot No. 008 Map No. ; Lot No Map No. ; Lot No			

Other permits, licenses, approvals, etc., required prior to commencement of

construction:

30231 12-1-98

WAYLAND CODE

Special permit:			Υ	
Variance:			N	
Subdivision approval not required under				
	L c. 41, § 81P:	N		
Subdiv	vision approval under MGL c	. 41, § 81U:	N	
	rvation Commission order of		N	
Board	of Health construction works	permit:	N	
	chusetts Environmental Prote	ction		
	IEPA) review:		N	
Massa	chusetts Highway Departmen	t curb cut permit:	N	
All oth	ner required permits, licenses,	approvals, etc.:		
Typ	e:Medical Marijuana Treatment Center	; Issuing authority: Cannabis Control C	commission	
Type	e:	_; Issuing authority:		
Тур	e:	_; Issuing authority:		
Тур	e:	_; Issuing authority:		
Type	e:	; Issuing authority:		
e.	Describe the timing of a (include copies of all perm	Il permit, etc., applications lis its already obtained):	ted in Paragraph d above	
	The applicant is applying for a Special Permit or Commission once it receives all applicable local	ontemporaneously with the submittal of this Site Plan I permits.	Review application. It will apply for a license from the Cannabis Control	
6. Hi	story of the use of the site:			
0. 111				
a. Past uses, as researched from readily obtainable sources (cite sources):				
The current property owner reports that the property has been used for office condominiums since 2001.			ffice condominiums since 2001.	
b.	Present use(s):			
	Office condominiums.			
C.	All zoning variances gra descriptions of each:	nted, listed chronologically by	case number, with brief	
	N/A			
d.	All special permits gran descriptions of each:	ted, listed chronologically by	case number, with brief	
e.	If any part of the site is pro	tected as a nonconforming use or	r structure, describe:	
	N/A			
f.	subdivision and date of approval:			
	Name: N/A	_ Date of approval:		
7. Ex	Existing site characteristics:			
a.	Total acreage of site: 3.27	6 acres		

30232

12-1-98

SITE PLAN REVIEW AND APPROVAL

	b.	Total acreage in Floodplain District: 0; % of total acreage:
	c.	Total acreage in Aquifer Protection District: 0; % of total acreage:
	d.	Total acreage in Watershed Protection District: 0; % of total acreage:
	e.	Total acreage in wetlands and wetland buffer areas, as defined by MGL c. 131, § 40:
		Wetlands: 0; % of total acreage: 0 Buffers: 0; % of total acreage: 0
	f.	Total acreage of legally dedicated open space:; % of total acreage:
8.	Prop	posed site characteristics: No changes proposed.
	a.	Total acreage of site:
	b.	Total acreage in Floodplain District:; % of total acreage:
	c.	Total acreage in Aquifer Protection District:; % of total acreage:
	d.	Total acreage in Watershed Protection District:; % of total acreage:
	e.	Total acreage in wetlands and wetland buffer areas, as defined by MGL c. 131, § 40:
		Wetlands:; % of total acreage: Buffers:; % of total acreage:
	f.	Total acreage of legally dedicated open space:; % of total acreage:
9.	Exis	sting and proposed site improvements:
	a.	Existing structures, with name and total square footage of footprint and gross floor area of each:
		Name: Existing building; Footprint area: 23,000 SF;
		Gross floor area: 23,000 SF
		Name:; Footprint area:; Gross floor area:;
		Name:; Footprint area:;
		Gross floor area:
		Name:; Footprint area:;
		Gross floor area:
		Name:; Footprint area:;
		Gross floor area:; Name:; Footprint area:;
		Gross floor area:
		Name:; Footprint area:;
		Gross floor area:
		Name:; Footprint area:;

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WAYLAND CODE

		Gross flo	or area:	
	Gra	and totals:	Footprint area: 23,000 SF; Gross floor area: 23,000SF	
	b. Proposed structures, with name and area of each: No changes proposed.		structures, with name and total square footage of footprint and gross floor ach: No changes proposed.	
	Gross floor area:; Footprint are Gross floor area:		; Footprint area:; or area:; footprint area:; or area:; Footprint area:;	
Grand totals: Footprint area:; Gross floor area:;		nd totals:		
	C.		are footage and number of spaces by type of existing parking:	
Area:; Spaces: No		Area:	; Spaces: No changes proposed.	
d. Total square footage and number of spaces		Total squ	are footage and number of spaces by type of proposed parking:	
Area:; Spaces:		Area:	; Spaces: No changes proposed.	
e. Describe existing and proposed materials used for any i		Describe	existing and proposed materials used for any impermeable surfaces:	
No changes proposed.				
			f sewage disposal and summary of drainage impacts: s proposed.	
	g.	Describe	existing and proposed access to the site:	
		No change	es proposed. Please see project narrative.	
10.	Sub	mit the foll	lowing written documents and materials:	
	a. List of and justification for requested waivers: Date received:		d justification for requested waivers:	
	b.		calculations: ived:; Waived:	
	C.		of water resources impacts: ived:; Waived:	
	d.		of landscape impacts: ived:; Waived:	
	e.	Statement and report of traffic impacts: Date received:; Waived:		

SITE PLAN REVIEW AND APPROVAL

f.	Statement of waste disposal impacts: Date received:	; Waived:	
g.	Receipt from Town Clerk: Date received:	; Waived:	,
h.	Fee: Amount:; Date received:;	; Waived:	
I hereby	request site plan approval under the Z	oning Bylaws, Article 6	5.
Signatur	e and printed name of applicant(s):		
		Date:	
		_Date:	
Signatur	e and printed name of owner(s) of reco	ord, if different:	
		Date:	
		Date:	
		Date:	
-		_Date:	
		Date:	
		Date:	
		Date:	
		_Date:	
Form C r	received by (signature):Printed name:	_Date:	
			(Cont'd on page 30237)

30235

Earth Well Farms, LLC ("Earth Well") seeks a Special Permit and Site Plan Review approval from the Wayland Planning Board to operate a Medical Marijuana Treatment Center ("MMTC") engaged in the cultivation, product manufacturing, and sale of medical marijuana and marijuana products within 23,000 SF of the existing office building located at 526 Boston Post Road in Wayland, Assessors Parcel 21-008 (the "Property"). The Property is located within the Medical Marijuana District and is not located within 500 feet of a preexisting public or private school providing education in kindergarten or any of grades 1 through 12. As such, pursuant to Wayland Zoning Bylaw §198-2605.1.2, such a use is permissible subject to a Special Permit and Site Plan Review Approval from the Planning Board.

I. Project Context

The Property comprises 23,000 square feet within an existing 40,752 square foot building with eight condominium office suites. The Property abuts the Wayland-Sudbury town line. Earth Well intends to exclusively utilize the portions of the premises and site plan within the Town of Wayland for its proposed MMTC. While the underlying real estate straddles the town line, no operations will occur within the Town of Sudbury. Please see the enclosed Site Plans and Floor Plans (collectively, the "Plans"), attached hereto as

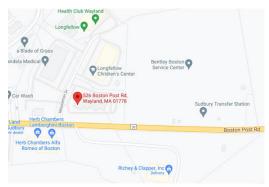


Exhibit A, which demonstrate the portion of the property intended for use. The Plans were designed in full compliance with the standards set forth by the Wayland Zoning Bylaw.

II. Project Narrative

With a focus on safe, sustainable, and efficient operations, Earth Well has identified the Property as an ideal location at which to operate a MMTC. The Property is located in an area designated by local zoning for the aforementioned use, allows for easy access for patients and employees, and will allow the parcel to be developed to its highest and best use.

A. Project Exterior

Site Access: Access to the premises is gained through two existing curb cuts along Minuteman Drive. Frontage along Boston Post Road is shielded by trees and other vegetation and buttressed by a guard rail, completely obscuring the building from view along the main road.

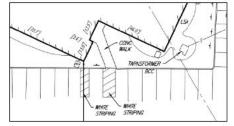




No exterior modifications are proposed for the frontage of the building facing Minuteman Drive, which is currently a nondescript office building that matches the look and feel of surrounding parcels including a manufacturing facility across the street and wellness clubs further down Minuteman Drive. All customer and employee access occurs on the rear side of the building adjacent to Boston Post Road, pictured to the right of the above photo.

Parking and Loading: There are 193 existing parking spaces on site. Of these spaces, over 60 will be reserved for use for patients and employees with the ability to designate additional parking spaces as needed.

All loading will occur within the right rear entry of the building utilizing the existing concrete walk as shown within the portion of the site plan demonstrated to the right. The company's loading and delivery protocols will strictly comply with all standard operating procedures that comply with the Massachusetts Cannabis Control Commission's ("Commission") regulations and in a manner approved by the



Commission following review of such procedures and an on-site inspection to ensure site security.

The parking lot also includes an existing fenced trash enclosure adjacent to the rear property line which will be secured in accordance with Cannabis Control Commission security preferences. Existing locking and storing mechanisms will remain in place which allow all tenants of the facility access. No marijuana waste will be stored within the exterior waste receptacles under any circumstances.

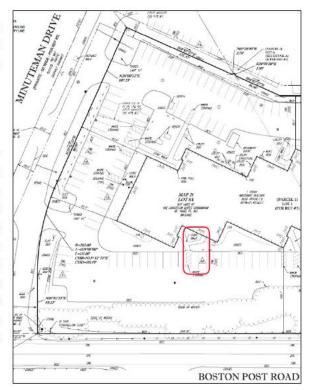


Signage and Lighting: Facility signage will be discrete and utilized for wayfinding only. One sign will be affixed on the front of the building and the company's name will be placed on the existing placard in the front of the site that lists all tenants of the building. Additionally, Earth Well will also include its name on the vertical wayfinding placard at the corner of Minuteman Drive and Boston Post Road pictured at the left. Earth Well will not utilize signs or printed materials advertising marijuana products or any logo or symbols with images of marijuana.

No changes to exterior lighting fixtures are proposed. Earth Well's exterior security cameras utilize infrared capabilities and do not require external sources of light to operate effectively.

Facility Access:

The primary patient and staff entry to the facility will be located at the existing entry point and concrete walk located on the side of the building that is most proximate to Boston Post Road, circled in red towards the image to the right. The entry vestibule is designed using an interlock, meaning that the main entry to the facility will only open if all interior access doors leading to the dispensary or employee areas are closed and locked, ensuring that no individual is able to gain immediate access to secured areas within the facility.

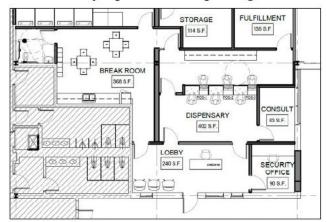


B. Project Interior

Patients will only have access to designated portions of the facility, including (1) a secure entry vestibule in which patients must demonstrate proof that they have the appropriate credentials to enter the facility; (2) a general sales floor with point-of-sale terminals; (3) a secure consultation room; and (4) restrooms. The secure entry vestibule and general sales floor will be appropriately sized to ensure the facility can accommodate all patients seeking entry to the facility to prevent exterior queuing.

The rest of the facility will only be accessible to staff on a tiered basis and includes (1) cultivation rooms; (2) drying rooms; (3) a shipping and receiving area; (4) a water treatment area; (5) a packaging room; (6) a trim room; (7) storage areas; (8) product manufacturing areas; (9) staff areas; (10) security room; (11) vault and fulfillment rooms; (12) mechanical and IT rooms; and (13) processing areas.

C. Facility Operations: Dispensing



In accordance with 935 CMR 501.140(3), access to the facility is limited to individuals that are 18 years of age or older that can demonstrate that they are current patients in Commonwealth's Medical Use of Marijuana **Program** via program identification card as well as valid government-issued identification. Upon a patient's entry into the premises, an agent will immediately inspect their proof identification and determine the individual's age and the validity of their program

identification card. Failing this confirmation, an individual will be required to leave the facility utilizing the same door in which they entered. Patients can indicate while checking in that they are interested in seeing a discrete consultation in Earth Well's consultation area.

Once inside the sales area, patients will enter a queue to obtain individualized service where they may select any of the products available to them with the help of an agent. Once a patient has selected a product for purchase, an agent will collect the chosen items from the designated product storage area. An agent will then scan each product barcode into the point of sale system. Upon checkout, patients will be required to confirm their identities and age a second time. In the event an agent determines an individual would place themselves or the public at risk, the agent will refuse to sell any marijuana products to the consumer.

Patients will promptly exit the facility utilizing the secured vestibule leading back to the parking lot.

D. Facility Operations: Cultivation and Product Manufacturing

Please see **Exhibit B** which outlines all proposed cultivation and product manufacturing operations at the facility.

III. Property Operations

A. Trash

Marijuana Waste: Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 501.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Specifically, liquid waste containing marijuana will be disposed of in compliance with all applicable state and federal requirements and stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.

Organic material, recyclable material, and solid waste generated at a marijuana establishment will be redirected or disposed of as follows:

- 1. Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.
- 2. Recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission.
- 3. Any remaining marijuana waste will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.
- 4. Solid waste containing cannabis waste will be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purposes. Once such cannabis waste has been rendered unusable, it will be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located.

No fewer than two agents will witness and document how the marijuana waste is disposed or otherwise handled (recycled, composted, etc.) in accordance with all applicable state regulations. When marijuana products or waste is disposed or handled, Earth Well will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Earth Well agents will be present during the disposal or other handling, with their signatures.

Non-marijuana Waste: Waste that does not contain marijuana will be stored in the locked dumpster to the rear of the building and picked up weekly by a commercial trash vendor.

B. Snow Removal

Snow removal will remain the responsibility of the Property's landlord, who will utilize an existing local vendor for all plowing and shoveling services.

C. Loading

Product deliveries will depart from the facility between two to three times each week in unmarked transport vans. Pursuant to state regulations, there will be no advertising, markings, or branding indicating that the vehicle is being used to transport marijuana. Routes and times used for the transportation of marijuana and marijuana products are randomized. Marijuana and marijuana products will be transported in secure, locked storage compartments that are a part of the vehicle transporting the marijuana products and cannot be easily removed. At least two agents will staff vehicles transporting marijuana.

An armored car service will pick up monetary instruments as needed each week.

D. Traffic and Parking

With over 190 parking spaces located on-site, Earth Well respectfully submits that there is ample parking to accommodate its projected patients. The company will take great care to develop, implement, and refine operational procedures that ensure that patient visits are short and will not result in congestion within the parking lot or the store. Operational procedures will be continually evaluated and adjusted as necessary to ensure optimal function of the facility.

Earth Well respectfully submits that its proposed use of the Property will not disturb the existing right of way, pedestrian access, and will not cause a hazard to vehicle or pedestrian traffic. Traffic generated and patterns of access and egress will not cause congestion, hazard, or a substantial change to the neighborhood character.

Earth Well recognizes the critical importance of operational planning and collaboration with the Town to ensure that its fledgling months of operation do not pose a nuisance to the surrounding community. Please see Earth Well's proposed Opening Day Plan, attached hereto as **Exhibit C**.

IV. Compliance with Wayland Zoning Bylaw § 198-2607.1-5

2607.1.1. Outside storage. No outside storage of marijuana, marijuana products, or related supplies shall be permitted.

All marijuana, marijuana products, and related supplies will be stored within the facility.

2607.1.2. Visibility of activities. All activities shall be conducted indoors, except for the lawfully authorized delivery or transportation of medical marijuana.

All activities will be conducted within the existing building.

2607.1.3. Paraphernalia. No retail marijuana, marijuana products, or paraphernalia shall be displayed so as to be visible from outside of the licensed premises.

In accordance with all Cannabis Control Commission regulations, absolutely no marijuana, marijuana products, or paraphernalia will be visible from the outside of the premises. The existing exterior of the building does not facilitate any interior visibility.

2607.1.4. Hours of operation. The special permit granting authority may impose restrictions on the hours of operation.

Earth Well respectfully requests the following hours of operation:

Dispensing:

Monday: 9:00 AM – 9:00 PM Tuesday: 9:00 AM – 9:00 PM Wednesday: 9:00 AM – 9:00 PM Thursday: 9:00 AM – 9:00 PM Friday: 9:00 AM – 9:00 PM Saturday: 9:00 AM – 9:00 PM Sunday: 10:00 AM – 7:00 PM

Due to the nature of cultivation and manufacturing activities, Earth Well respectfully requests that these actions not be time-limited to allow for continued care of plants based on harvest times and grow cycles.

2607.1.5. On-site consumption of marijuana is prohibited.

Earth Well will strictly prohibit on-site consumption of marijuana by patients or other members of the public. The exterior of the facility will remain under constant video surveillance. During hours of operation, security personnel will patrol the exterior of the facility. Should violations to this policy occur, the patient will be banned from the facility and reported to the local police department and the Cannabis Control Commission.

V. Compliance with Wayland Zoning Bylaw § 198-2608

2608.1.1. Permanent location. All RMDs shall be operated from a fixed location within a fully enclosed building.

Earth Well's proposed location is a fixed location within a fully enclosed building.

2608.1.2. Signage. All signage must comply with the regulations set forth in § 198-501 of the Zoning Bylaw.

All proposed signage will strictly comply with the regulations set forth in § 198-501 of the Zoning Bylaw.

2608.1.3. Lighting. Outdoor light levels shall not exceed one footcandle along property lines, nor 10 footcandles for any location on the property. Any light poles, new or existing, may not exceed 18 feet in overall height. All outdoor light fixtures must be shielded and aimed down in order to prevent light trespass onto adjacent properties. RMDs may not illuminate growing operations between dusk and dawn, unless within a fully enclosed, opaque building.

No modifications to the existing exterior site lighting fixtures are proposed.

All growing operations illuminated between dusk and dawn will be within a fully enclosed, opaque portion of the building.

2608.1.4. Landscaping. Landscaping shall be designed in harmony with the building with surrounding uses as stated in § 198-601 et seq., of the Zoning Bylaw.

No modifications to the existing landscaping are proposed.

2608.1.5. Parking. Off-street parking must be provided as stated in § 198-506 of the Zoning Bylaw. Off-street loading must be provided as stated in § 198-507 of the Zoning Bylaw. For buildings or sites that contain more than one type of marijuana use, each use shall be calculated separately and parking provided for each use on site, based on gross floor area of the individual uses. These requirements may be modified or waived by the special permit granting authority.

Dispensary: For general retail businesses, commercial and personal service establishments, parking facilities on the basis of one parking space per 140 square feet of gross floor area. In addition to this amount, one parking space for every two employees shall be provided.

Cultivation and Product Manufacturing: For office, professional or public buildings, one off-street parking space for each 200 square feet of ground floor area not used for bulk storage and one parking space for each 400 square feet of floor area other than ground floor.

Use	Floor Area – First Floor	Floor Area – Second Floor	Number of Employees	Total
Dispensary	725 SF @ 1 parking space per 140 SF = 5.17 spaces	0	8 employees @ 1 parking space per 2 employees = 4 spaces	10 parking spaces
Cultivation, Manufacturing	3,254 SF @ 1 parking space per 200 SF not used for bulk storage =16.27	7,249 SF @ 1 parking space per 400 SF = 18.12	N/A	36 parking spaces
TOTAL PARKING REQUIRED				46 parking
				spaces

§198-506 stipulates that 46 parking spaces are required. Based on the description of off street loading requirements outlined in § 198-507, Earth Well anticipates needing two spaces designated exclusively for loading. Earth Well's proposed allocation of 60 parking spaces far exceeds the requirement of 48 parking spaces.

2608.1.6. Drive-through facilities. Drive-through RMDs shall be prohibited.

Earth Well does not propose drive-through operations.

2608.1.7. Fencing. Fencing may be required if determined necessary by the special permit granting authority. In no instance shall barbed-wire fencing be permitted.

Earth Well believes that the intent of this portion of the Bylaw is satisfied through the existing vegetative buffers in place along the frontage of the building occurring on Boston Post Road. A picture of such buffers is included below.



No exterior modifications are proposed for the frontage of the building facing Minuteman Drive, which is currently a nondescript office building that matches the look and feel of surrounding parcels including a manufacturing facility across the street and wellness clubs to further down Minuteman Drive.



2608.1.8. Odor control. RMDs engaged in cultivation, processing, product manufacturing, storage and/or transportation shall employ odor control technology such that no odor from the RMD can be detected by a person with an unimpaired and otherwise normal sense of smell at the exterior of the facility or at any adjoining use or property.

Please see the attached Odor Control Plan attached hereto as Exhibit D.

V. Compliance with Wayland Zoning Bylaw § 198-2609.1

2609.1.1. Site plan. A site plan shall be submitted that includes all information required under § 198-601 et seq., Site Plan Approval, and must also include the following.

Please see Exhibit A.

2609.1.2. The names, mailing addresses, phone numbers, email addresses, and signatures of the applicant, owner, and operator.

Applicant: Earth Well Farms, LLC

526 Boston Post Road Wayland, MA 01778 508-276-6530 jrwatkins@anchovis.com

Owner and operator: Jonathan Watkins 20 Forty Acres Drive Wayland, MA 01778 508-276-6530 jrwatkins@anchovis.com

2609.1.3. Physical address (if one exists), and the map, lot, and block number of the proposed site.

The physical address of the site is 526 Boston Post Road, Wayland, MA 01778, Map 21, Lot 8A.

2609.1.4. Security plan. The security plan shall be delivered directly to the local Police Chief and reviewed and approved by the local Police Chief, or their designee, to ensure the safety of employees, patrons, and the public to protect the premises from theft or other criminal activity.

A Security Plan has been delivered to the Wayland Police Chief.

2609.1.5. Traffic study. The special permit granting authority may require a traffic study that includes an analysis of traffic generation, circulation, and off-street parking demand to determine sufficient parking and optimum configuration for site ingress and egress.

With over 190 parking spaces located on-site, Earth Well respectfully submits that there is ample parking to accommodate its projected patients. The company will take great care to develop, implement, and refine operational procedures that ensure that patient visits are short and will not result in congestion within the parking lot or the store. Operational

procedures will be continually evaluated and adjusted as necessary to ensure optimal function of the facility.

Earth Well respectfully submits that its proposed use of the Property will not disturb the existing right of way, pedestrian access, and will not cause a hazard to vehicle or pedestrian traffic. Traffic generated and patterns of access and egress will not cause congestion, hazard, or a substantial change to the neighborhood character.

Earth Well recognizes the critical importance of operational planning and collaboration with the Town to ensure that its fledgling months of operation do not pose a nuisance to the surrounding community. Please see Earth Well's proposed Opening Day Plan, attached hereto as **Exhibit C**.

2609.1.6. Photometric plan. A photometric plan may be required by the special permit granting authority, or their designee, before or after the marijuana use is in operation.

No changes to exterior lighting fixtures are proposed. Earth Well's exterior security cameras utilize infrared capabilities and do not require external sources of light to operate effectively.

2609.1.7. State license. Proof of a provisional certificate of registration from the Cannabis Control Commission or any successor licensing entity shall be required for RMDs.

Earth Well respectfully requests that satisfaction of this criteria be conditioned prior to obtaining a Building Permit. Earth Well is not able to apply for a state license until such time that it executes a Host Community Agreement with the Town of Wayland.

2609.1.8. Proof of site control. Evidence that the applicant has site control and the right to use the site for a marijuana use in the form of a deed, valid lease, or purchase and sale agreement or a notarized statement from the property owner certifying the applicant has site control.

Please see Exhibit E.

2609.1.9. Energy resource plan. All RMDs engaged in marijuana cultivation, processing and product manufacturing shall submit an energy and resource use plan to the special permit granting authority to demonstrate best practices for resource conservation. The plan shall include an electrical system overview, proposed energy demand, ventilation system and air quality, proposed water system and utility demand.

Please see Exhibit F.

V. Compliance with Wayland Zoning Bylaw § 198-606.2

606.2.1. The proposal shall be integrated into the existing terrain and surrounding landscape. Proposals shall, to the extent feasible: Minimize the use of wetlands, steep slopes, floodplains and hilltops; Preserve natural or historic features; Maximize retention of open space; Preserve scenic views from publicly accessible locations; Minimize tree, vegetation and soil removal, blasting and grade changes; and Screen objectionable features from adjacent properties and roadways.

No exterior modifications to the Property are proposed. Thus, there will be no use of wetlands, no modifications of the existing terrain, no modifications to natural historic features or open space; no modifications of scenic views; nor changes to existing landscaping features.

606.2.2. The proposal shall include an adequate water supply system and adequate sewage and other waste disposal systems. Where sewage disposal systems are required, the applicant shall submit information as required by the Board of Health.

No modifications to the existing water supply system and sewage are proposed. The facility is an existing office building that appropriately manages similar waste demands to what would be proposed within a MMTC.

Earth Well intends to utilize drip irrigation, which will ensure all water use is managed on an automated schedule and virtually eliminates excess water waste or runoff from the plants. This practice has been identified as a cultivation best practice by the Cannabis Control Commission in its "Guidance on Best Practices for Water Use".

Earth Well intends to utilize water recapture methods through drain pipes and lines, dehumidifiers, and condensation recapture modules. The recaptured water will be treated to prevent the growth and spread of microbial pathogens. Occasionally, the system will be flushed and new water will be introduced. Water that is not reused following system flushing will be collected and stored in a MassDEP certified holding tank (Transmittal Form DEP01) for disposal at an approved facility.

606.2.3. The proposal shall incorporate measures adequate to prevent pollution of surface water or groundwater; to minimize erosion and sedimentation; to prevent changes in groundwater levels and increased rates of runoff; and to minimize potential for flooding. Drainage shall be designed to maximize groundwater recharge and to prevent any increase in the rate and volume of runoff at the site's perimeter.

The proposal does not feature any modifications that would impact existing drainage.

606.2.4. To the extent feasible, the proposal shall minimize demands placed on Town services and infrastructure.

The proposal will have limited, if any, impact placed on Town services and infrastructure. Following the execution of a Host Community Agreement with the Town of Wayland, Earth Well will provide regularly occurring payments to the Town as mitigation for any impacts that do occur as a result of its operations.

606.2.5. The proposal shall provide safe vehicular and pedestrian movement within the site and to adjacent ways, including sidewalks, crosswalks and the like.

The proposal provides safe vehicular and pedestrian movement within the site and to adjacent ways. Please see Exhibit A.

606.2.6. Design of buildings, structures and landscaping shall be in harmony with the prevailing character and scale of said buildings, structures and landscaping of the zoning district of the site and of adjacent properties. Such design shall include the use of appropriate building materials, screening and similar architectural techniques.

The proposal does not feature any modifications that would impact exterior design.

606.2.7. To the extent practicable, electric, telephone, cable television and other utilities on the site shall be placed underground.

The proposal does not feature any modifications that would require the installation of overhead utilities.

606.2.8. Exposed storage areas, machinery, service areas, truck-loading areas, utility buildings and structures and similar unsightly buildings, structures, uses and activities shall be set back and/or screened to the extent feasible to protect adjacent properties from objectionable features.

Please see Exhibit A. All loading areas have been set back are screened from nearby roadways.

606.2.9. To the extent feasible, proposals shall be designed to minimize shadows cast on adjacent properties in residential zoning districts.

The proposal does not feature any modifications that would modify shadows cast.

606.2.10. There shall be no unreasonable glare from lighting, whether direct or reflected, onto roads and other ways, into the night sky or onto adjacent properties in residential zoning districts.

No modifications are proposed that would result in any new glare from lighting, whether direct or reflected, onto roads and other ways, into the night sky or onto adjacent properties in residential zoning districts.

606.2.11. The proposal shall comply with this Zoning Bylaw. However, proposals that do not so comply may be approved hereunder if such noncompliance is permitted by the ZBA pursuant to other articles of this Zoning Bylaw and the applicable provisions of this Article 6.

Earth Well respectfully submits that this proposal has been drafted to comply with the Zoning Bylaw.

Exhibit A: Site and Floor Plans

EARTH WELL FARMS, LLC

PERMITTING PLANS

526 BOSTON POST ROAD, WAYLAND, MA JANUARY 2022

PREPARED FOR

BOUNDARY AND LOCATION SURVEY BY CONTROL POINT ASSOCIATES

EARTH WELL FARMS, LLC

SHEET TITLE

COVER SHEET

SITE LAYOUT PLAN

SHEET INDEX

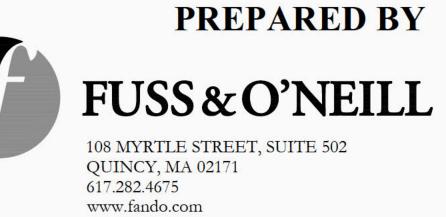
SHEET No.

SHEET 1 OF 1

GI-001

CS-101

526 BOSTON POST ROAD WAYLAND, MA 01778



PROJECT TEAM

APPLICANT:

EARTH WELL FARMS, LLC 526 BOSTON POST ROAD WAYLAND, MA 01778 617-934-2121

OWNER:

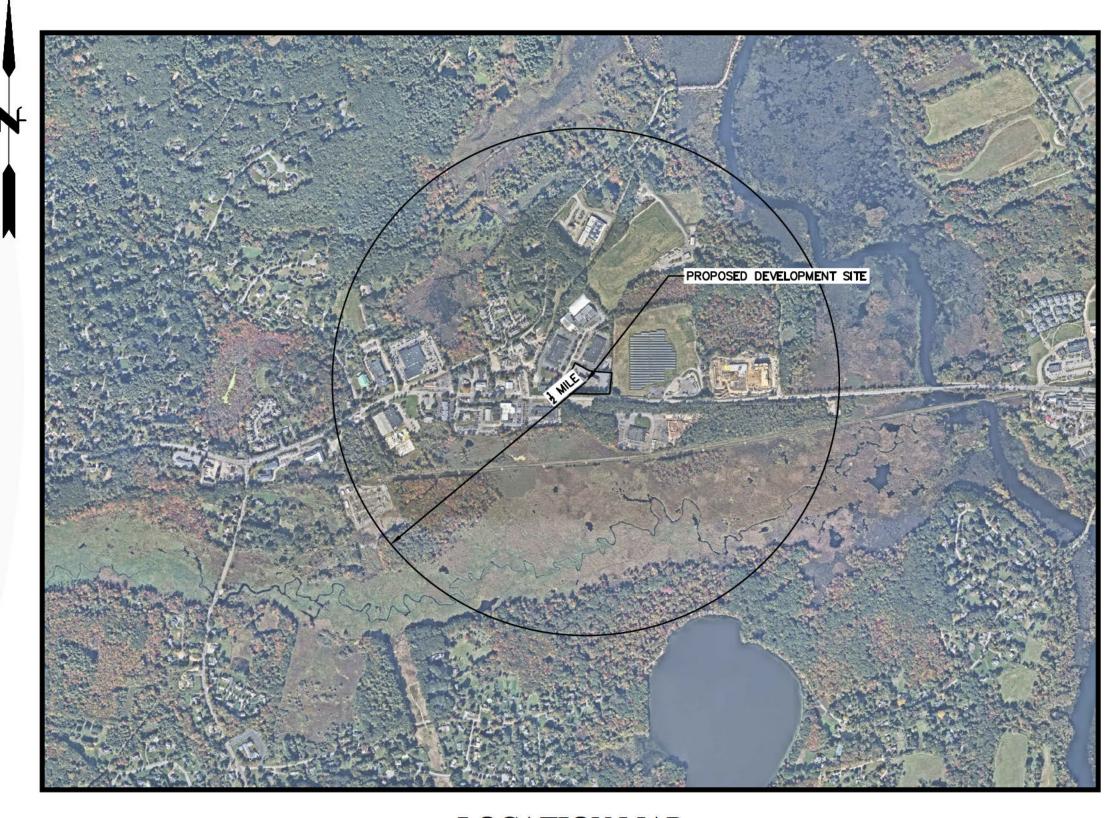
HDR HOLDINGS, LLC PO BOX 70 WAYLAND, MA 01778 617-934-2121

LAND SURVEYOR:

CONTROL POINT ASSOCIATES 352 TURNPIKE ROAD SOUTHBOROUGH, MA 01772 508-948-3000

ARCHITECT

BKA ARCHITECTS INC. 344 BOYLSTON STREET BOSTON, MA 02116 508-728-3853



LOCATION MAP

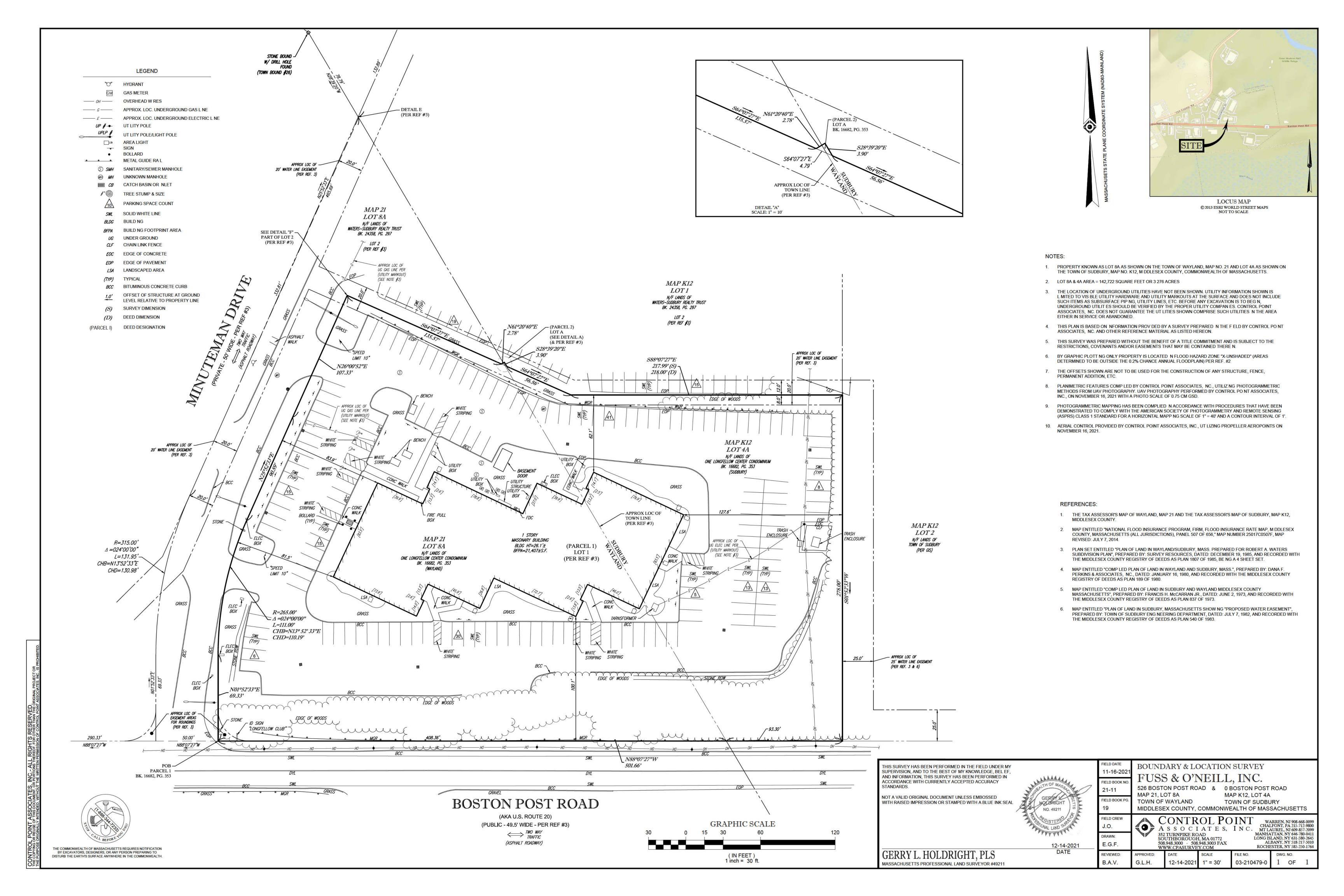
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DATE SITE PLAN ENDORSED:

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GI-001

DATE: January 2022

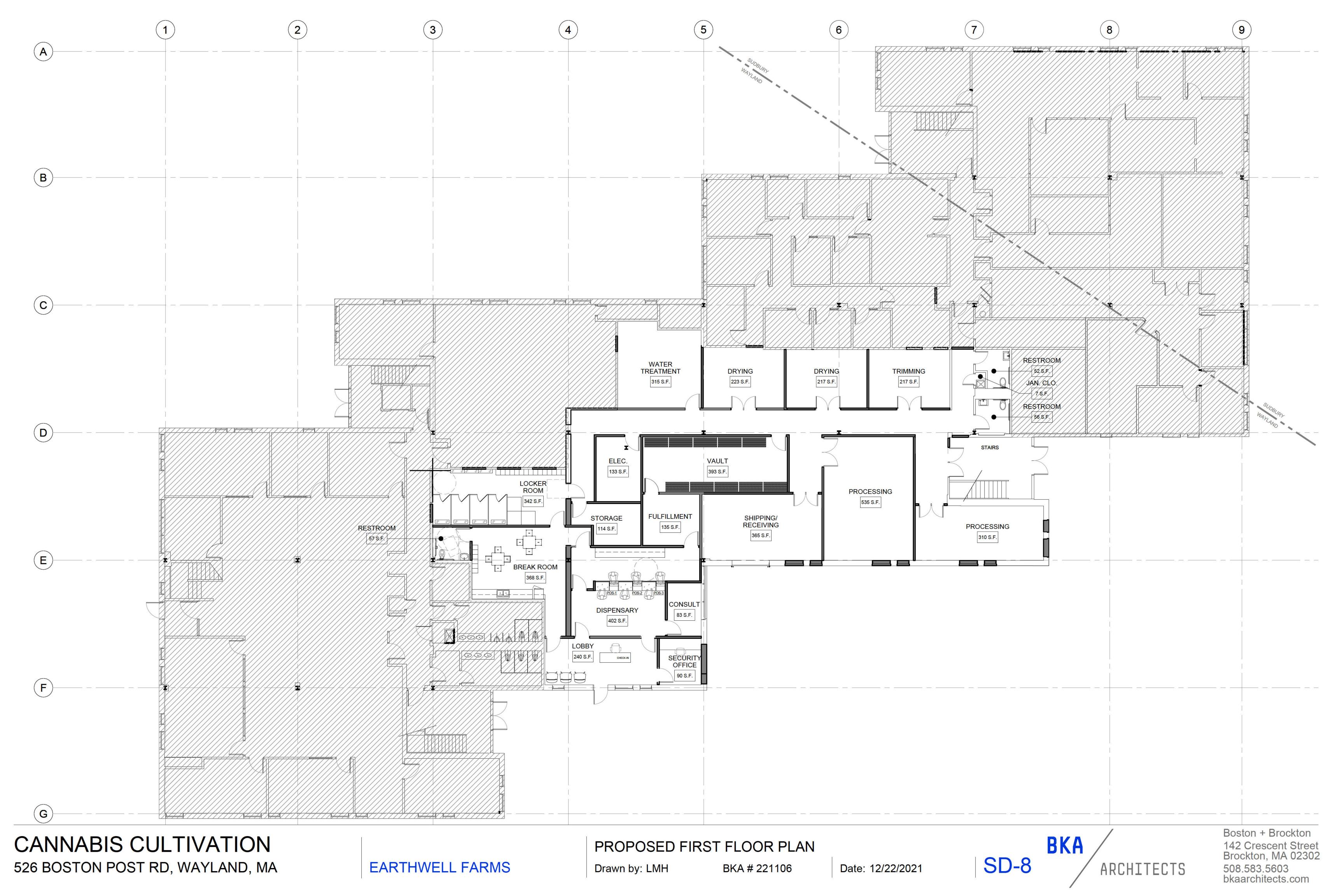


&O'NEILL

SITE

PROJ. No.: 20210871.A10

DATE: JANUARY 2022



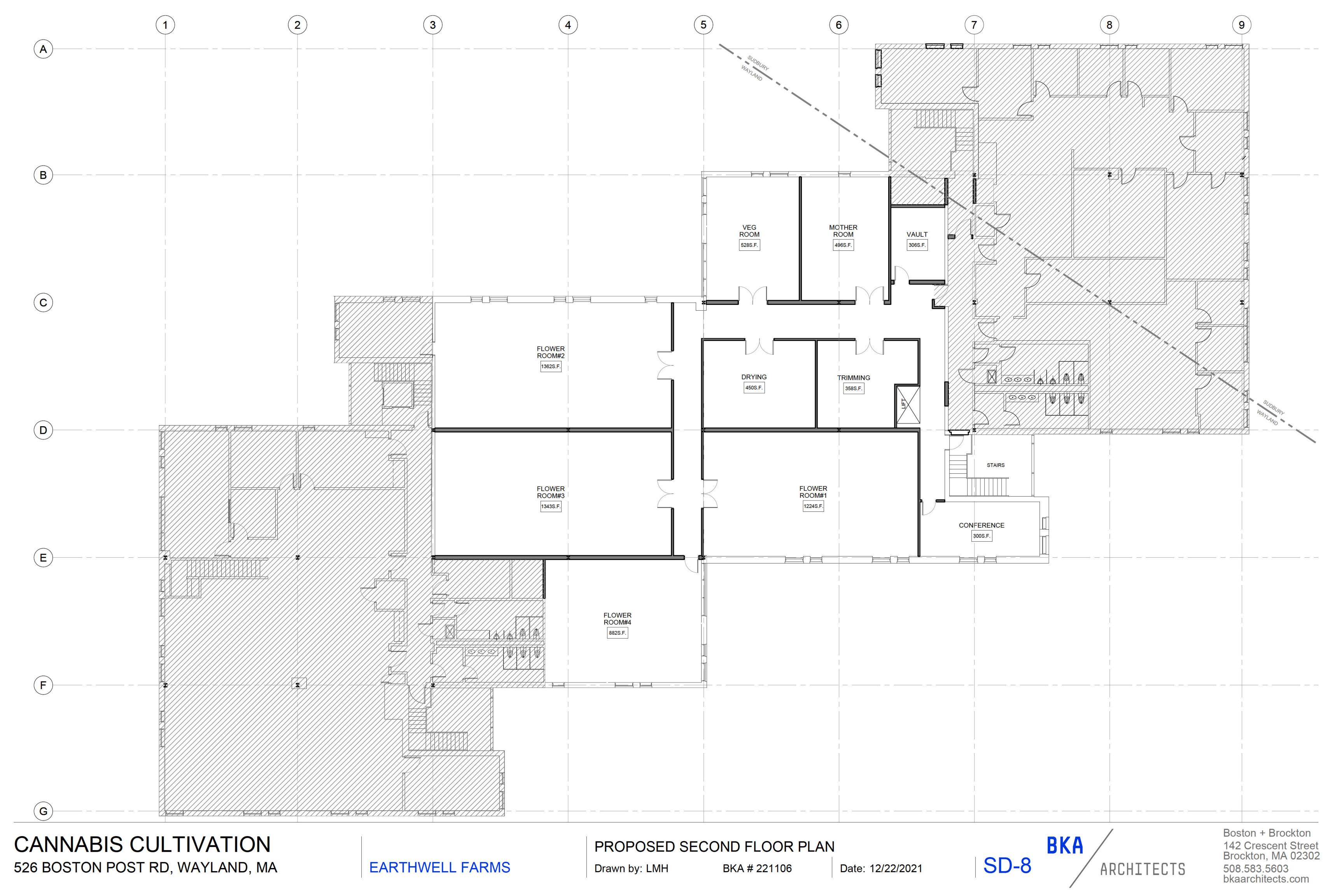


Exhibit B: Cultivation and Product Manufacturing Operations

Overview

Earth Well will cultivate, process and package marijuana, and transfer marijuana to other Marijuana Establishments (but not to consumers other than through its sales floor operation), in accordance with Earth Well's licensed cultivation tier. All phases of the cultivation, processing, and packaging of marijuana by Earth Well will take place in a designated area that is not visible from a public place without the use of binoculars, aircraft or other optical aids.

Earth Well's cultivation process will use best practices to limit contamination including, but not limited to, mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 501.120(5) for use on marijuana, mildew, and any other contaminant identified as posing potential harm. Earth Well's best practices will be compliant with state and local law, including but not limited to, the Commission's *Guidance on Integrated Pest Management* currently in effect and as subsequently amended. Any application of plant nutrient to land used for the cultivation of marijuana will comply with St. 2012, c. 262, as amended by St. 2013, c. 118, § 26, and 330 CMR 31.00: *Plant Nutrient Application Requirements for Agricultural Land and Non-agricultural Turf and Lawns*.

Earth Well, through the use of Metrc, will assign and record a unique, sequential alphanumeric identifier to each cultivation batch for the purposes of production tracking, product labeling, and product recalls.

Cultivation Rooms and Facilities

Cultivation Rooms

- Clone Room
- Mother Room
- Vegetative Room
- Flowering Rooms

Support Rooms

- Supply Storage Room
- General (non-plant) Trash Room
- Plant Trash Room
- Locker Rooms
- Mechanical Room
- Electrical room
- Trim Room
- Dry Room

<u>Technical Specifications</u>

The Earth Well facility utilizes a water-chilled system/heat to control temperature and humidity levels. Cultivation rooms are individually controlled and monitored through the use of a Direct Digital Control ("DDC"), which is an automated control of a condition or process by a digital device. Adjustable environmental parameters include heat, humidity, and light control. Cultivation rooms that house plant material will be under video surveillance—as outlined in the Earth Well Security Policies and Procedures.

Overview of Cultivation Rooms

<u>Clone Room</u>: The Clone Room is initially dedicated to the germination of seeds during ramp up, and then will be used to house clones from mother plants, which will be chosen from initial seed stock. Cloning, the act of taking a genetically identical specimen from mother stock, takes place in the clone room. The Cultivation Technician that oversees the Mother Room and Clone Room propagates plant material and is responsible for the plants' life cycle from cutting to vegetative phase.

<u>Mother Room</u>: The Mother Room houses all selected plants from initial seed stock that meet the characteristics that the Director of Cultivation is looking for in each strain of marijuana. The Mother Room consists of grow lights that offer the proper wavelengths of light to encourage rapid growth to produce clones on a weekly basis. The Mother Room light cycle is twenty-four (24) hours of light.

<u>Vegetative Room</u>: The Vegetative Room houses all plants that are in between the Clone Room and Flowering Rooms. Grow lights will be used to encourage vegetative growth and proper root establishment. Plant material will also be transitioned from low intensity lighting to high intensity to prevent transplant/light shock. The Vegetative Room light cycle varies between eighteen to twenty-four (18-24) hours of light.

<u>Flowering Rooms</u>: The Flowering Rooms consist of marijuana plants fed from the vegetative room. Marijuana plants are placed under a twelve/twelve (12/12) light cycle to initiate flowering. With the use of grow lights, the flowering marijuana plants receive the correct amount of red/orange wavelengths of light to promote proper flowering behavior. The Flowering Rooms are where the plants' life cycles end; this period can vary from eight to twelve (8-12) weeks.

Safety

All agents will complete mandatory safety training sessions. Earth Well agents and Earth Well management will have specific responsibilities to ensure health and safety at the Earth Well facility:

Health and Safety Responsibilities for Earth Well Management:

- Ensure the health and safety of Cultivation Technicians;
- Correct any workplace conditions that are hazardous to the health and safety of Cultivation Technicians:
- Inform Cultivation Technicians about any remaining hazards;
- Make copies of the *Workers Compensation Act* and OSHA Regulations available by posting throughout the Facility;
- Ensure agents know their rights and responsibilities under OSHA Regulations and the Act and that they comply with them;
- Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them;
- Provide Cultivation Technicians with education, supervision, and training specific to the Cultivation Facility and equipment used to cultivate; and
- Perform ongoing reviews of policies and procedures and update as needed.

Health and Safety Responsibilities for Earth Well Agents:

- Take care to protect individual health and safety and the health and safety of others who may be affected by individual's actions;
- Comply with all regulations and other legal requirements;
- Follow established safe work procedures;
- Use the required personal protective equipment;
- Refrain from horseplay or similar conduct that may endanger others;
- Ensure individual ability to work safely is not impaired by drugs or alcohol;
- Report accidents and other incidents (including near misses) to the Director of Cultivation; and
- Report the following to the Director of Cultivation:
 - o A hazard that might endanger Earth Well agents;
 - A problem with personal protective equipment or clothing; and
 - Any suggestions to improve workplace safety.

<u>Cultivation Agent Health and Safety Program</u>: Eight basic components have been identified to help prevent accidents and injuries from occurring within the Cultivation Facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - o Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout Cultivation Facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns. Smoking is prohibited on Earth Well property.

Plant Care

Cultivation Technicians will be responsible for all plant maintenance in their assigned cultivation rooms. Responsibilities will include watering/irrigation, potting/re-potting, pruning and Integrated Pest Management (IPM). The IPM Program is designed to control and limit pests and other pathogens. Cultivation Technicians will maintain appropriate levels of sanitation in all cultivation

areas and keep assigned cultivation rooms clean and free from hazards. Toxic items will be labeled, identified appropriately, held, and stored in the cultivation supply room in order to protect marijuana and MIPs from being contaminated.

<u>Irrigation</u>: All plants will be top fed via drip irrigation. Multiple reservoirs located throughout the cultivation rooms will feed plants, and reservoirs will contain the mixture of water and a concentrated two-part fertilizer that will be adjusted to the proper ppm/EC levels that are required for the different stages of the marijuana plant cycle. The irrigation water will also be adjusted to the proper pH level to ensure proper nutrient uptake. Cultivation Technicians are responsible for their assigned reservoirs. Responsibilities include filling reservoirs with water and adding concentrated nutrients to reach the proper nutrient levels required and adjusting pH with the use of nutrient/pH meter. Cultivation Technicians will monitor the flow of irrigation through the system to ensure that all plants are receiving adequate amounts of water. Cultivation Technicians will consult with the Cultivation Manager and Director of Cultivation with regards to irrigation frequency and duration.

<u>Potting/Re-Potting</u>: All plants will be using a mixture of coco fiber and perlite in nursery pots. Cultivation Technicians are responsible for potting up plants in their assigned cultivation rooms. Cultivation Technicians will consult with the Cultivation Manager/Director of Cultivation regarding the timing of re-potting in order to maximize plant potential and to ensure that plants do not become root-bound. All Cultivation Technicians will be trained by the Director of Cultivation on proper potting techniques during initial training.

<u>Pruning</u>: Marijuana plants will be pruned regularly to encourage adequate growth traits and to maximize flowering sites on the plant. Pruning will also be used to maximize the yield potential of individual plants and also to eliminate flowering sites that do not receive adequate light due to full canopy. Cultivation Technicians will undergo training in this procedure by the Director of Cultivation during initial training to ensure proper techniques.

Pest Control Prevention

Pests and pathogens will be managed and controlled to the greatest extent possible. Pests include insects, diseases, or any unwanted organism that directly or indirectly damages plants. Earth Well will implement an Integrated Pest Management (IPM) Program to manage and control pest problems. IPM is a systematic approach to managing pests that focuses on long-term prevention or suppression with minimal impact on human health, the environment, and non-target organisms. A successful IPM Program consists of five (5) main categories: sanitation, monitoring, identification of pest problems, control methods, and evaluation.

<u>Sanitation</u>: Maintaining a clean and sterile environment is the most important phase of the IPM program. Agents will be responsible for ensuring assigned cultivation rooms are properly maintained, floors remain free from debris, and that tables on which plants are being grown are clean. Between harvests, Flowering Rooms, including floors, tables and walls, will be treated with a greenhouse disinfectant. All irrigation systems and lines will be cleaned between harvests. Cultivation Technicians will be required to wear one-piece work jumpsuits during shifts to limit the introduction of unwanted pests/pathogens.

<u>Monitoring</u>: IPM requires a thorough assessment of plants and their overall appearance. Cultivation Technicians will perform visual assessments for their dedicated areas and report any findings to the Cultivation Manager and Director of Cultivation.

<u>Identification of Pest Problems</u>: Visual inspections are the primary method for determining if pest problems exist in the Cultivation Facility. Sticky traps will be used throughout cultivation rooms to allow agents to consistently monitor pests that may be present. If and when a pest/pathogen is identified, Cultivation Technicians will immediately notify the Cultivation Manager and Director of Cultivation in order to minimize the risk of the pest/pathogen from spreading. In conjunction with the Director of Cultivation, the Cultivation Manager will create a remedial plan to eliminate the pest or pathogen.

<u>Control Methods</u>: The goal of the IPM Program is to create and maintain a well-organized and sanitized Cultivation Facility. The use of cultural control methods places a focus on proper environmental conditions and is critical to maintaining them. Biological control methods will be used throughout the Cultivation Facility. Biological agents (plant, animal, or microbe) will be used to control pests. When necessary, Cultivation Technicians will use mechanical controls (i.e. handson and exclusion techniques) such as handpicking and destroying pests/or pathogens or destroying plants that are heavily infected in order to prevent other plants from becoming contaminated. Cultivation Technicians will also utilize exclusion methods, such as making sure cultivation room doors remain closed, prohibiting non-essential agents from entering cultivation rooms, and requiring agents to change into uniforms when their shift begins.

Soil for cultivation will meet the U.S. Agency for Toxic Substances and Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels.

The cultivation process will use best practices to limit contamination, including but not limited to mold, fungus, bacterial diseases, rot, pests, pesticides not in compliance with 501.120(5) for use on marijuana, mildew, and any other contaminant identified as posing potential harm.

<u>Evaluation</u>: All aspects of the IPM Program will be thoroughly documented, including frequency, rates, methodology, and time/date when applied. Such records will be utilized to determine any necessary changes in the IPM Program and will be retained as part of Earth Well's recordkeeping requirements.

<u>Cultivation Agent Entrance Procedures</u>

All Cultivation Technicians will enter the Cultivation Facility using the main exterior door. Upon entry, Cultivation Technicians will proceed directly to the Locker Rooms to change into Earth Well issued uniforms and will then report to their assigned Cultivation Room(s).

<u>Cultivation Flow</u>

<u>Clone Room</u>: Initial ramp up begins with the germination of seeds in the Clone Room. Seeds will be germinated in rockwool cubes and housed in the clone room for up to 3-4 weeks. All viable plants will continue to be grown under fluorescent lighting in the Clone Room until determined by the Director of Cultivation that plants are ready to be transitioned into the Vegetative Room.

<u>Vegetative Room</u>: After plants leave the Clone Room they will be transported directly to the Vegetative Room, where they are introduced to high intensity light, which encourages rapid growth. All seeds/clones are repotted into a coco-based media upon entering the Vegetative Room. Marijuana plants will be housed in the Vegetative Room for 2-4 weeks depending on individual, strain-specific characteristics. During the initial ramp up phase, some plants will be diverted into the Mother Room for the purpose of creating mother stock from which future propagation from clone/cuttings will be taken. The Vegetative Room will house plants before they transition into Flowering Rooms.

<u>Mother Room</u>: All mother stock plants are housed in the Mother Room. Plant growth is encouraged through a light cycle and nutrient regimen to produce the maximum amount of cuttings/clones. Cultivation Technicians assigned to the Mother and Clone Rooms will be responsible for taking cuttings from mother stock and propagating within the Clone Room.

<u>Flowering Rooms</u>: After plants are grown in the Vegetative Room, they will be transported directly into Flowering Rooms. In the Flowering Rooms a 12 hour on/12 hour off light cycle flowering will be initiated. Marijuana plants finish their life cycle in the Flowering Rooms and can spend anywhere from 8-12 weeks in the flowering phase. Flowering Rooms may house multiple varieties and different stages of the marijuana flowering phase. All plants will remain properly labeled and tracked using Metrc. Earth Well anticipates harvests on a weekly or bi-weekly schedule to ensure a steady flow of marijuana is available.

Production Plan

All initial plant stock will come from the germination of seeds. After initial seed germination, all subsequent plants will be propagated via cutting/clone from mother stock. Under the supervision of the Director of Cultivation, Cultivation Technicians will use a variety of techniques to encourage rapid, vigorous growth in both the Mother and Vegetative Rooms to ensure a sufficient number of plants to feed the Flowering Rooms.

Harvest

When marijuana plants reach full maturity, as determined by the Director of Cultivation or Cultivation Manager by examining the trichomes of the plant, plants will be cut down to the soil line in the Flowering Rooms and transferred to the Trim Room. Trimming will be conducted by a machine while the flowers are wet. Cultivation Technicians engaged in the harvest process will wear gloves to prevent contamination. After marijuana flowers are processed by the mechanical trimmer, they will be moved to the Dry Room. The environmental conditions in the Dry Room will be maintained to ensure the even drying of marijuana flowers. Once dried, marijuana flowers will be packaged in sealed containers in compliance with Commission regulations. Samples of batches are sent out for third-party testing.

Testing

a. No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories. Testing of marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol established in accordance with M.G.L. c. 94G, § 15 and in form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling*

- and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products. Testing of environmental media (e.g., soils, solid growing media, and water) will be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission;
- b. Marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. Earth Well acknowledges and understands that the Commission may require additional testing;
- c. Earth Well will have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits. Any such policy will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch, and (ii) of any information regarding contamination as specified by the Commission or immediately upon request by the Commission. The notification will be from both Earth Well and the Independent Testing Laboratory, separately and directly. The notification from Earth Well will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination;
- d. Earth Well will maintain the results of all testing for no less than one year, and acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year will be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested;
- e. The sale of seeds is not subject to these testing provisions;
- f. Clones are subject to these testing provisions but are exempt from testing for metals;
- g. All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 501.105(13);
- h. All storage of marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 501.105(11);
- i. All excess marijuana will be disposed of in compliance with 935 CMR 501.105(12), either by the Independent Testing Laboratory returning excess marijuana to Earth Well for disposal or by the Independent Testing Laboratory disposing of it directly;
- j. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 501.160;
- k. Single-servings of marijuana products tested for potency will be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).
- 1. Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

Application of pesticides by Earth Well will be performed in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00. Any testing results indicating noncompliance will be immediately reported to the Commission, who may refer any

such result to the Massachusetts Department of Agricultural Resources ("MDAR"). In the event that Earth Well sells or otherwise transfers marijuana to another Marijuana Establishment, Earth Well will provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 501.160. Earth Well will only label marijuana with the word "organic" if all cultivation is consistent with US Department of Agriculture organic requirements at 7 CFR 205 and MDAR requirements for pesticide usage. Soil for cultivation will meet federal standards identified by the Commission, including but not limited to the U.S. Agency for Toxic Substances and Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels.

Solid Growing Media Sampling

Cultivation media will be tested in compliance with Commission protocols. Soil for cultivation will meet the federal standards identified by the Commission, including but not limited to the U.S. Agency for Toxic Substances and Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels. All soils and solid growing media will be sampled and analyzed initially prior to use for cultivation of marijuana, and at least annually, or quarterly if the soil is amended. Specifically, all source soils or solids will be sampled and analyzed prior to use in cultivation and whenever new soils or solids are received from a different source. Samples will be taken from 5% of individual plant containers. Sample collection documentation will identify the sample collection date and start time, participating personnel, a general description of the media and locations sampled, relevant environmental conditions, a description of the sampling procedures and equipment decontamination/cleaning used, and a record of plants or batches that would potentially be impacted should analysis results indicate unacceptable contamination. Agents performing sampling will use decontaminated sampling tools and equipment to ensure that samples are not contaminated. All instructions from the analyzing laboratory will be followed in the transportation of samples. Laboratory analysis will be performed by a laboratory that is:

- Accredited to International Organization for Standardization (ISO) 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement; or
- Certified, registered, or accredited by an organization.

Source soils will be sampled and analyzed:

- Prior to use in cultivation:
- Whenever a new source material is utilized; or
- At a rate of one sample per cubic yard of source soil or, when collected prior to distribution among beds or containers, source soil or solids samples will be taken to best represent the overall source soils (e.g., collected from different areas and depths of a stockpile).

Source soils and solids passing initial testing requirements may be stockpiled for later use without requiring re-analysis unless the stockpile has been contaminated or altered while stored. Situations for re-analysis may include, but are not limited to, soils that have been amended, mixed with other source soils/solids, subject to pesticide application, used for other purposes, or inundated by flood waters.

Cultivation soils will be analyzed at least annually during the calendar year of use. Solids tested initially as source soils or solids prior to use in cultivation do not require retesting until the

following year (or quarter if amended as described below). If amended, the solid growing media/soil used in cultivation will be sampled and analyzed during the quarter in which it was amended. Cultivation soil and solid samples will be collected to represent the broad range of cultivation units, growth stages, and soil and solid types whether from beds or containers.

Sources of solid growing media including soils must be sampled and analyzed prior to use in cultivation and upon any change in the source of solids. Once cleared for use in cultivation, cultivation soils must be sampled and analyzed at least annually and within the quarter that soils are amended. The spatial distribution of samples must be considered to ensure representativeness across the entire cultivation operation. Sampling and analysis frequency, sample locations, and quality control (QC) samples are detailed herein and will comply with all regulatory guidance and will be periodically reviewed and amended to ensure such compliance.

Minimum Sampling and Analysis Frequency for Soils and Solids

Source Soils and Solids

- All source soils and solids will be sampled and analyzed prior to use in cultivation.
- All source soils and solids will be sampled and analyzed whenever a new source material is utilized (e.g., different source soil location or different source solid manufacturer).
- All source soils and solids for initial use must be sampled at the rate of one (1) sample per cubic yard of solid media/soil.
- Source soils and solids passing initial testing requirements may be stockpiled for later use
 without requiring re-analysis unless the stockpile has been contaminated or altered while
 stored. Situations for re-analysis may include but are not limited to soils that have been
 amended, mixed with other source soils/solids, subject to pesticide application, used for
 other purposes, or inundated by flood waters.

Cultivation Soils or Solids

- All cultivation soils and solid materials will be analyzed at least annually during the calendar year of use. Solids tested initially as source soils or solids prior to use in cultivation do not require retesting until the following year (or quarter if amended as described below).
- If amended, the solid growing media/soil used in cultivation will be sampled and analyzed during the quarter in which it was amended. Note that soil amendment includes any material added to a soil, including other soils, to improve its physical properties, such as water retention, permeability, water infiltration, drainage, aeration, and structure. Note that soil amendment does not include addition of water or fertilizers added solely for nutrients. Materials such as compost or manure that are added for nutrients and to change the character of the soil and that are added in bulk are considered soil amendments for the purpose of this protocol. Application of soil amendments must be consistent with all Commission requirements.
- For cultivation that utilizes beds or other broad area cultivation, solid growing media/soil samples will be collected at the rate of 1 sample per discrete cultivation unit or at least 1 sample per 100 square feet of soil area for larger discrete cultivation units.
- For cultivation that utilizes individual plant containers (as opposed to beds or in-ground cultivation), solid growing media/soil samples will be collected from a minimum of 5 percent of the total number of growing containers.

- Solid growing media samples will be collected to be representative of the horizontal and vertical conditions of the growing configuration.
- When collected prior to distribution among beds or containers, source soil or solids samples will be taken to best represent the overall source soils (e.g., collected from different areas and depths of a stockpile).
- Cultivation soil and solid samples will be collected to represent the broad range of cultivation units, growth stages, and soil and solid types whether from beds or containers.
- Samples will be analyzed individually as grab samples unless the analysis methods used allow analytical reporting limits to be achieved on composite sample analyses that would demonstrate that any single sample in the composite would not exceed the contaminant limits described later in this protocol. In no case may more than five (5) primary samples be composited into a single sample for analysis. When analyzed as a composite, the laboratory results of the composite must demonstrate that each composite subsample is below the relevant contaminant limits, not just the composite itself. For example, if the results of a five-sample composite are reported as 1.0 mg/kg, any one subsample (20% of the total composite) could contain up to 5 mg/kg when accounting for the effective dilution of the other four subsamples (i.e., 1 sample at 5 mg/kg + 4 samples at 0 mg/kg = average of 1 mg/kg).
- Composite samples are not recommended but are allowable to scale sampling and analysis to fit the cultivation scale and approach. However, use of composite samples to demonstrate compliance would require corrective actions on all individual samples should the composite sample fail to achieve acceptable limits on any target analyte.

A diagram of the cultivation area, the sampling design, and the horizontal and vertical location of each sample will be created for each sampling event and maintained on file for review by inspection authorities.

Quality Control (QC) Samples for Soils and Solids

Field duplicate samples will be collected at least annually and one (1) for every twenty (20) field samples of the solid samples collected to provide verification of field and laboratory procedures. Field duplicate samples will be collected and analyzed for each analytical method performed on the samples. Field duplicate samples will not be identified to the laboratory (blind QC). Blank samples are required to provide important information on potential positive bias on any positive results in field samples.

Equipment rinsate blanks are required whenever non-disposable sampling equipment is used to collect samples at multiple locations such as in source soil testing or testing of hydroponic nutrient solutions. Equipment rinsate blanks must be collected at the rate of one (1) per sampling event per sampling equipment type with at least one (1) equipment rinsate blank for every twenty (20) field samples of the same matrix. Where equipment rinsate blanks are not appropriate (i.e., use of disposable sampling equipment, collection of just one sample location, or direct collection into the sampling container), field blanks may be used to evaluate potential for contamination and potential positive bias at the same frequency of one (1) per sampling event per sampling equipment type with at least one (1) for every twenty (20) field samples of the same matrix.

Recalls

Earth Well's policies and procedures for handling voluntary and mandatory recalls of marijuana will be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by Earth Well to remove defective or potentially defective marijuana from the market, as well as any action undertaken to promote public health and safety.

Product recalls may be initiated by the Commission or by Earth Well. In the event of a product recall, the following will transpire to ensure that all impacted consumers are promptly notified and such recalled product is destroyed:

- Knowing the product in question, determine the beginning and end dates in which product needs to be recalled (i.e. establish the recall period);
- Earth Well will then publicly post the nature of the recall on its website and at its facilities; and
- The recall will clearly explain the situation and instructions on returning the recalled product.

Consumers will return the recalled product to Earth Well and will be given the option of a refund or credit to be used during that visit. Destruction of the recalled product will occur pursuant to waste disposal requirements.

Waste Disposal

- a. All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on Earth Well's premises will be locked and secured as to prevent unauthorized access.
- b. Liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers Construction, Operation, and Record Keeping Requirements.
- c. Organic material, recyclable material, and solid waste generated at an Earth Well facility will be redirected or disposed of as follows:
 - 1. Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: *Waste Bans*.
 - 2. To the greatest extent feasible:
 - i. Any recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission; and

- ii. Any remaining marijuana waste will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: *Site Assignment Regulations for Solid Waste Facilities*.
- 3. Solid waste containing marijuana generated at an Earth Well facility may be ground up and mixed with other solid waste at the Earth Well facility such that the resulting mixture renders any marijuana unusable for its original purpose. Once such marijuana has been rendered unusable, the resulting solid waste may be brought to a solid waste transfer facility or a solid waste disposal facility (*e.g.*, landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located; or
- d. No fewer than two Earth Well agents will witness and document how the solid waste or organic material containing marijuana is handled on-site, including, but not limited to, the grinding up, mixing, storage and removal from the Earth Well facility in accordance with state regulations. When marijuana products or waste is disposed or handled, Earth Well will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Earth Well agents present during the disposal or other handling, with their signatures. Earth Well will keep these records for at least three years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

Energy Efficiency and Conservation

Earth Well will demonstrate consideration of the following factors:

- a. Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
- b. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- c. Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage); and
- d. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

Earth Well will satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including, but not limited to, those related to water quality quantity, wastewater, solid and hazardous waste management, and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: *Air Pollution Control* as a condition of obtaining a final license and as a condition of renewal. Earth Well will adopt and use additional best management practices as determined by the Commission, in consultation with the working

group established under St. 2017, c. 55, § 78(b), or applicable departments or divisions of the EOEEA, to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts, and will provide energy and water usage reporting to the Commission in a form determined by the Commission. Each license renewal application will include a report of Earth Well's energy and water usage over the 12-month period preceding the date of application. Earth Well will be subject to the following minimum energy efficiency and equipment standards:

- a. The building envelope for all facilities, except greenhouses, must meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code, except that facilities using existing buildings may demonstrate compliance by showing that the envelope insulation complies with code minimum standards for Type Factory Industrial F-1, as further defined in guidelines issued by the Commission.
- b. Lighting used for Earth Well's cannabis cultivation will meet one of the following compliance requirements: (i) Earth Well's horticulture lighting power density will not exceed 36 watts per square foot, except for Tier 1 and Tier 2 which will not exceed 50 watts per square foot; (ii) all horticultural lighting used in the Earth Well facility will be listed on the current Design Lights Consortium Solid-State Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission as of the date of license application, and lighting Photosynthetic Photon Efficacy (PPE) will be at least 15 percent above the minimum Horticultural QPL threshold rounded up to the nearest 0.1 μmol/J (micromoles per joule); or (iii) the Earth Well facility seeking to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission will seek a waiver and provide documentation of third-party certification of the energy efficiency features of the proposed lighting. Earth Well, regardless of compliance path, will provide third-party safety certification an OSHA NRTL or SCC-recognized body to a set of safety requirements and standards deemed applicable to horticultural lighting products by that safety organization.
- c. Heating Ventilation and Air Condition (HVAC) and dehumidification systems must meet Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), IECC Section C.403 or ASHRAE Chapter 6 as applied or incorporated by reference in (780 CMR: State Building Code). As part of the documentation required, Earth Well will provide a certification from a Massachusetts Licensed Mechanical Engineer that the HVAC and dehumidification systems meet Massachusetts building code and that such systems have been evaluated and sized for the anticipated loads of the facility.
- d. Safety protocols will be established and documented to protect workers and consumers (e.g., eye protection near operating horticultural lighting equipment).
- e. Prior to final licensure, Earth Well will demonstrate compliance by submitting an energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation, together with submission of building plans, or through an energy compliance letter or updated energy compliance letter prepared by one or more of the following energy professionals:

 (i) a Certified Energy Auditor certified by the Association of Energy Engineers; (ii) a

- Certified Energy Manager certified by the Association of Energy Engineers; (iii) a Massachusetts Licensed Professional Engineer; or (iv) a Massachusetts Licensed Registered Architect.
- f. Earth Well acknowledges and understands that for purposes of 935 CMR 501.120(11), the following terms shall have the following meanings: Horticultural Lighting Equipment (HLE) means any lighting equipment (e.g. fixtures, bulbs, ballasts, controls, etc.) that uses energy for the cultivation of plants, at any stage of growth (e.g. germination, cloning/Mother Plants, Propagation, Vegetation, Flowering, and harvest); Horticulture Lighting Square Footage (HLSF) means Canopy; and Lighting Power Density (HLPD) means a measure of total watts of Horticultural Lighting Equipment per total Horticulture Lighting Square Footage, (HLE/HLSF = HLPD) expressed as number of watts per square foot.

Method Used to Produce Products

Overview

Earth Well will produce concentrates for bulk sale and the creation of marijuana products using supercritical CO2 and then refined to extremely high purity and cleanliness using a fractional distillation process. The refinement process will reduce levels of microbials (mold, yeast, gram negative bacteria, etc.) and heavy metals down to an undetectable scale. This will ensure Earth Well can provide consumers with clean and safe products.

Earth Well is committed to producing marijuana products in a safe and sanitary manner. Earth Well will process leaves and flowers of the female marijuana plant only, which will be well cured and free of seeds, stems, dirt, sand, debris, and other foreign matter and will not be contaminated by mold, rot, other fungus, and/or bacterial diseases. Marijuana products will be prepared and handled on food-grade stainless steel tables with no contact to agents' bare hands and will be packaged in a secure area.

The Earth Well facility will utilize standards based on municipal health codes, as well as FDA codes, to ensure optimal safety of all food products produced and is designed with ample cold storage and sanitization equipment to ensure food safety.

All edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State sanitary code chapter X: Minimum sanitation standards for food establishments, 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases*, *Surveillance, and Isolation and Quarantine Requirements* as applicable.

Earth Well agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Earth Well agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Earth Well facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Earth Well agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

The Earth Well facility has ample space for placement of equipment and storage of materials necessary for maintaining sanitary operations. Litter and waste will be properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to state regulations.

All surfaces and equipment within the Earth Well facility will be cleaned frequently in order to ensure that they are kept in a clean and sanitary condition. Surfaces and equipment will be sanitized with a sanitizing agent registered by the EPA and used in accordance with the labeled instructions.

Any and all toxic materials will be properly identified and stored in a manner that protects against contamination of marijuana products. Proper safety and cleanliness procedures will be visibly posted or easily accessible in the Earth Well facility. Earth Well's water supply is sufficient for necessary operations. Toxic items will not be stored in an area containing products used in the cultivation of Marijuana.

Notwithstanding a stricter municipal or state regulation, Earth Well will identify the method of extraction (i.e. CO2) on a physical posting at all entrances of its facility. The posting will be a minimum of 12" x 12" and identify the method of extraction in lettering no smaller than one inch in height. Earth Well will post a copy of a permit to keep, store, handle or otherwise use flammable and combustible at each place of operation within the facility.

Earth Well, when selling or otherwise transferring marijuana to another marijuana establishment, will provide documentation of its compliance, or lack thereof, with the testing requirements and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Earth Well will maintain written policies and procedures for the production or distribution of marijuana products, as applicable.

Product Manufacturer Processes

The Earth Well facility utilizes state of the art extraction technology by way of a supercritical fluid (SCCO2) botanical extractor. Further refinement of this raw CO2 concentrate will be

accomplished using a fractional distillation still for removal of any trace amounts of microbial and heavy metals contamination. This highly purified concentrate will be used in precision-dosed marijuana products, as well as sold in bulk and in vaporizer cartridges.

- <u>Drying</u>: Any material to be processed through the supercritical fluid CO2 extractor will be dried as much as possible. Trim is to be dried on perforated sheet pans lined with parchment and placed on speed racks. Trim material will be laid on sheet pans in a thin layer in order to dry properly and quickly. A fan will circulate air around the trim in order to expedite drying, as well as prohibit biological contamination. Trim and whole plant material may also be dried in the ovens at a low temperature so as to prevent decarboxylation.
 - O Safety: If trim or plant material is handled in the Earth Well facility, the agent must wear a dust-mask as well as gloves and a lab coat.
 - Ocleaning: The inside of grinders and food processors will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material and then cleaning and sterilizing in the high temperature washer/sanitizer.
- <u>Grinding</u>: Sufficiently dried material will be ground to the consistency of fine coffee grinds, using a (designated) large food processor or botanical chopper. Once the material is ground to proper specification, it will be stored in large 6-inch, stainless steel pans with stainless steel lids with appropriate labeling regarding batch information.
 - O Safety: If trim or plant material is handled in the Earth Well facility, the agent must wear a dust-mask, as well as gloves and a lab coat.
 - <u>Cleaning</u>: The inside of grinder or food processor, along with its blade, will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material, prior to cleaning and sterilizing in the high temperature washer/sanitizer. The grinder/food processor body will be wiped down with lab wipes after each batch. The steel pans will be cleaned and sterilized after each batch is processed. This is accomplished using lab wipes to wipe out any remaining resinous material, and then cleaning and sterilizing in a high temperature washer/sanitizer.
- Packing Supercritical CO2 Extractor: The retaining bolts will be taken off the extraction vessel, the lid lifted up, and the provided funnel put in its place. The agent will fit 12-15lbs into the 20L vessel. The material to be processed will be packed lightly into the vessel using the provided plunger. Once full, the lid will be closed, and the extractor vessel bolts replaced using the provided torque wrench.
 - Safety: The agent will make sure vessel pressures are all 0psi. Using the User Interface, the agent will select "Open Extractor Vessel" from the maintenance screen, prior to removing the extractor vessel bolts. Packing of the column will be done in small increments and never too hard. Any time trim or plant material is handled in the Earth Well facility, the agent must wear a dust-mask, as well as gloves and a lab coat.
 - <u>Cleaning</u>: The agent will vacuum all of the processed material out of the extraction vessel using a (dedicated) shop vac. The outside of the SCCO2 extractor will be cleaned using sanitizing wipes. Running the machine empty overnight will suitably clean and sterilize the inside of the machine.
- Running SCCO2 Extractor:

- Safety: The machine has a number of built-in safety features in the event of over-pressure runs or solvent leakage. In the event that the machine is unable to recover CO2, slowly vent the CO2 from valve 10 at the bottom of separator #2 and evacuate the Earth Well facility until CO2 is completely vented. The provided ventilation in the Earth Well facility will remove all CO2 and replace it with fresh air from outside the building.
- <u>Cleaning</u>: All solvent lines will be cleaned out with acetone. Such cleaning will be performed under the closed lab fume hood so as not to release solvent vapors into the room. Once a week, the machine will be run empty, thoroughly cleaning the machine.

• Spin on Hotplate/Freeze:

- o <u>Safety</u>: The hotplate will continue to stay hot for some time even after it is turned off. The readout will read "HOT" until the plate is sufficiently cooled. Do not touch the hotplate when it is running or when the readout reads "HOT."
- <u>Cleaning</u>: The hotplate should be wiped down with a lab wipe after every use. If heavier cleaning is needed, wipe the plate down with denatured alcohol.

• Soak in Hot Ethanol:

- Safety: Ethanol must be heated under the hood. When removing ethanol from the hood, a solvent respirator must be worn by the lab agent to prevent hot fumes from being inhaled. Caution must be taken when pouring, as the liquid is hot.
- o <u>Cleaning</u>: Cleaned with acetone and sanitized in the sanitizing dishwasher.

• Filtering:

- O Safety: The cold trap must remain full of dry ice at all times to prevent contamination of ethanol into the vacuum pump.
- <u>Cleaning</u>: Replace used filters with new filters for each batch. Pass hot ethanol through the funnel to clean the filter. Sanitize in the sanitizing dishwasher.

• Removal of Ethanol in Rotary Evaporator:

- <u>Safety</u>: The agent should use caution not to fill the boiling flask of the rotary evaporator more than halfway. The cold trap must remain full of dry ice at all times to prevent contamination of ethanol in the vacuum pump.
- <u>Cleaning</u>: The boiling flask, receiving flask and vapor tube will be cleaned with acetone under the fume hood and sanitized in the sanitizing dishwasher.
- <u>Decarboxylating</u>: Decarboxylation or "decarbing" is the act of removing water from concentrate to aid in efficient distillation. To do this, the agent places a stainless-steel bainmarie or pot full of concentrate directly on to an induction burner. The concentrate should be heated quickly to a temperature of 180c then immediately removed from heat. At this point, the concentrate is fully decarboxylated.
 - O Safety: The induction burner must be set up under the fume hood and the task performed with the hood closed.
 - <u>Cleaning</u>: Clean the bain-marie with acetone under the fume hood and sanitize in the sanitizing dishwasher. Wipe the induction burner down with a lab wipe.
- <u>Fractional Distillation</u>: The cold trap on the left will always be full of acetone/dry ice to prevent terpenes from contaminating the pump oil. The feeder will be filled with no more than 500ml of dewaxed/decarbed oil in order to reduce the risk of clogs.
 - <u>Safety</u>: Never run the still dry—there must be material flowing from the feeder before turning the motor on.

• <u>Cleaning</u>: The still can be cleaned without being disassembled by running warm ethanol through under ambient pressure.

Definitions of Key Equipment

- <u>Supercritical CO2 Extractor</u>: A device used to extract cannabis oil from the plant matter. CO2 is used by Earth Well, as it is the safest, most environmentally friendly solvent available to the industry. CO2 is warmed, pressurized, and pumped through a column of cultivated material. The CO2 "fluid" soaks into the plant matter to extract and concentrate only the cannabinoids, terpenes and other medicinally beneficial components. The CO2 is then recycled back into storage tanks for later use. As this is a "closed loop" system, no CO2 is vented from the machine, at any time.
- <u>Fractional Distillation Still</u>: The fractional distillation still is used to further purify the CO2 concentrate. During this process, the material is heated under reduced pressure and recondensed and collected. The distilled concentrate is increased in purity and potency, resulting in a pharmaceutical-quality product suitable for human consumption.
- Rotary Evaporator: A rotary evaporator is used for cold recovery of ethanol in the purification process.
- <u>Blast Chiller</u>: A blast chiller is used to cryogenically freeze concentrate to keep it sterile, and to precipitate plant waxes and lipids for separation prior to distillation.
- <u>Fume Hood</u>: The fume hood is used as a safety measure when using solvent to clean lab glassware and utensils. All cleaning and soaking of glass and utensils will be done under the closed hood to prevent solvent fumes from being inhaled by agents.
- <u>Vacuum Purge Oven</u>: Used to desiccate material used prior to purification. Water removal is an important step in the purification process.

Standard Equipment

Standard equipment used in the Earth Well facility may include the following:

- Supercritical CO2 Extractor
- Fractional Distillation Still
- Rotary Evaporator
- Blast Chiller
- 3-bay Sink
- Closed Lab Hood
- Sanitizing Dishwasher
- Vacuum Purge Oven
- Hand Washing Station
- Eye Washing Station
- 4 Burner Gas Range
- Double-Decker Convection Oven
- Reach in Freezer
- Reach in Refrigerator

Policies and Procedures Regarding Cleaning and Sanitization

Cleaning and sanitization are both important factors in producing sterile concentrates and food-safe marijuana products for distribution to customers in Massachusetts.

• <u>Cleaning</u>:

- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the Earth Well facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.
- All contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
- Equipment and utensils utilized in the Earth Well facility be so designed and of such material and workmanship as to be adequately cleanable.

• <u>Sanitization</u>:

 Post cleaning sanitization is performed on all work surfaces, laboratory glassware, and kitchen cookware. The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50- 100ppm. Do not exceed 200 ppm.								
	per 2 quarts	per gallon	per 12 gallons					
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup					

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.

Safety

All agents will complete mandatory safety training sessions. Earth Well agents and Earth Well management will have the following responsibilities when it comes to health and safety:

• Earth Well Management:

- Ensure the health and safety of all agents.
- Correct any workplace conditions that are hazardous to the health and safety of agents.
- Inform agents about any remaining hazards.
- Make copies of the *Workers Compensation Act* and OSHA Regulations available by posting throughout the Facility.
- Ensure agents know their rights and responsibilities under OSHA Regulations and the Act and that they comply with them.
- Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
- o Provide agents with education, supervision, and training specific to equipment.
- Perform ongoing reviews and updates to policies and procedures as needed.

• Earth Well Agents:

- Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
- Comply with all regulations and other legal requirements.
- o Follow established safe work procedures.
- Use the required personal protective equipment.
- Refrain from horseplay or similar conduct that may endanger others.
- Ensure individual ability to work safely is not impaired by drugs or alcohol.
- Report accidents and other incidents (including near misses) to the Production Manager.
- Report the following to the Production Manager:
 - A hazard that might endanger Earth Well agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Earth Well Lab and Production Agent Health and Safety Program

Earth Well has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the Earth Well facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - o Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - o Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Earth Well facility, which will help identify workplace hazards so that they can be eliminated or controlled.

- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

Product Manufacturing Safety Plan

Earth Well will ensure that all edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

Agent Hygiene Practices

Earth Well agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All Earth Well agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the Earth Well facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All Earth Well agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

Food Material Practices

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

Food Contact Surface Sanitation Practices

The Company recognizes the importance of properly washing, rinsing, and sanitizing food preparation equipment, utensils, and all surfaces that come into contact with food to reduce the number of bacteria, prevent the spread of bacteria, and eliminate the possibility of cross-contamination. Earth Well will institute the following sanitation procedures in its commercial kitchen:

- Sanitizing solution should be used in the kitchen and other areas to sanitize food contact surfaces and utensils prior to use.
- All surfaces that come into contact with food will be washed, rinsed, and sanitized after each use, when an agent begins working with another type of food, anytime an agent is interrupted during a task and the tools or items they have been working with may have become contaminated, or at four-hour intervals if the areas or items are in constant use.
- Sanitizing solution will be stored in buckets or other containers such as a spray bottle and used with wiping cloths to sanitize prep tables, prep sinks, dining room tables, bar area,

and working utensils; in the third compartment of a 3-compartment sink to sanitize all dishes that are washed; and use the final rinse in the dish machine to sanitize all dishes that are washed.

• The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm Range recommended: 50-100ppm. Do not exceed	Amount needed per unit of water					
200 ppm.	per 2 quarts	per gallon	per 12 gallons			
Use provided test strips. Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup			

- o The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.
- Agents will ensure that all wiping cloths are soaked with sanitizer when cleaning food contact surfaces (like cutting boards, prep tables, slicers, etc.) and stored in sanitizer when not in use.
- Sanitizer buckets will be set up at all times in areas where food is being handled. Agents will check sanitizer solutions frequently to ensure that they are at the correct concentration, using the proper test strips for the type of sanitizing chemical that they are using.
- Sanitizer solutions will be changed as needed to properly sanitize food contact surfaces.
- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the Earth Well facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.
- Equipment and utensils utilized in the Earth Well facility be so designed and of such material and workmanship as to be adequately cleanable.

Training

All agents will complete mandatory safety training sessions. Earth Well agents and Earth Well management will have the following responsibilities when it comes to health and safety:

• Earth Well Management:

- Ensure the health and safety of all agents.
- Correct any workplace conditions that are hazardous to the health and safety of agents.
- Inform agents about any remaining hazards.
- Make copies of the OSHA Regulations and any workers compensation requirements available by posting throughout the facility.
- Ensure agents know their rights and responsibilities under OSHA Regulations and the Commission's requirements and that they comply with them.
- Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
- o Provide agents with education, supervision, and training specific to equipment.
- Perform ongoing reviews and updates to policies and procedures as needed.

• Earth Well Agents:

- Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
- Comply with all regulations and other legal requirements.
- o Follow established safe work procedures.
- Use the required personal protective equipment.
- Refrain from horseplay or similar conduct that may endanger others.
- Ensure individual ability to work safely is not impaired by drugs or alcohol.
- Report accidents and other incidents (including near misses) to the manager on duty.
- Report the following to the manager on duty:
 - A hazard that might endanger Earth Well agents;
 - A problem with personal protective equipment or clothing; or
 - Any suggestions to improve workplace safety.

Cleanliness & Sanitation Training:

Earth Well will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Earth Well's training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.

- Quality assurance procedures and consequences of failing to follow the company's established processes; and
- ServSafe certification training.

Earth Well Lab and Production Agent Health and Safety Program

Earth Well has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the Earth Well facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
 - o Dealing with wet surfaces;
 - Wearing proper personal protective equipment and clothing;
 - o Handling solvents with use of protective gloves and proper ventilation; and
 - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the Earth Well facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

When selling or otherwise transferring marijuana to another marijuana establishment Earth Well will provide documentation of its compliance with the testing requirements of *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

Exhibit C: Opening Day Plan

Earth Well shares the Town of Wayland's goals of ensuring that all operations at its proposed facility are designed to optimize local safety, minimize impact to the surrounding neighborhood, and allow Earth Well to operate harmoniously within the larger Wayland community.

I. Plan Goals

- 1. Ensure the safety of patients, employees, and surrounding abutters.
- 2. Minimize the impact of traffic flow on adjacent businesses and nearby streets.
- 3. Facilitate efficient parking lot operations to minimize back up on adjacent streets.
- 4. Implement efficient appointment systems to reduce initial traffic burdens.
- 5. Provide information to allow patients to get to/from the facility efficiently and safely.
- 6. Promote efficient coordination between Earth Well, the Wayland Police Department, and the Town of Wayland.
- 7. Establish open lines of communication with abutters and nearby residents and local businesses.

II. Site Plan and Parking

1. Use of Parking Spaces

Earth Well has access to over 60 exclusive spaces on site with the ability to add additional spaces as needed.

2. Parking Lot Management

For at least the first month of operation and as long as deemed necessary by Earth Well and Town officials, Earth Well will employ a parking lot attendant or police detail to allow for the safe and efficient flow of patients in and out of the parking lot. The parking lot attendants will direct patients to available parking spaces to eliminate backups occurring in and out of the lot and assist in ensuring that patients safely traverse the parking lot when walking in and out of the facility.

III. Interior Facility Capacity and Management

Earth Well's enclosed **Floor Plan** (See Exhibit A) has been designed to accommodate efficient patient visits while protecting consumer privacy, optimizing patient experience, and preserving the flow throughout the retail facility.

Oversight over the number of patients in the facility will be the responsibility of security staff stationed at the entry and exit points of the facility. Staff will utilize a digital tally system for an accurate count of who is in the facility at any given time.

IV. Dissemination of Traffic and Parking Information

Earth Well will be sure to include clearly marked information about appointment-only periods, traffic, and parking for its Wayland facility on its website and social media channels. Earth Well will provide information about appointment requirements, traffic, and parking in its responses to inbound media requests should it receive any. A map of traffic flows will be provided. Earth Well will provide the information to the Town of Wayland and the Police Department to post or share at its discretion.

Prior to opening, Earth Well will send a mailing to the neighborhoods closest to the establishment to inform them about opening procedures and provide contact information that they may utilize to receive additional information or alert Earth Well's management team about system inefficiencies.

V. Plan Evaluation

Earth Well respectfully requests the opportunity to meet with representatives from the Town of Wayland and the Wayland Police Department to discuss traffic and queue management at the following times:

- •Prior to opening the facility;
- •One week after opening;
- •One month after opening;
- •Three months following opening;
- •Six months following opening; and
- •Additionally, at the discretion of Earth Well, the Town of Wayland, and the Police Department.

VI. Plan Utilization Following Opening Day Period

During any periods of high traffic or higher than expected volume following the opening period, Earth Well will, independently or at the written request of Town officials or the Police Department, implement measures of the plan to ensure the facility is operating efficiently, safely, and in harmony with the surrounding community.

Exhibit D: Odor Control

1. Facility Information

Earth Well has consulted with an HVAC professional in order to install a fully functional HVAC system tailored to its facility. The HVAC system installed will ensure that any air that will be exhausted from the cultivation area will be ventilated through a carbon filter in order to prevent any odors from Earth Well's grow operations from reaching the exterior of the Property. The carbon filters will be swapped regularly to ensure constant odor elimination to the surrounding area.

In addition, each production room will be provided with dedicated fans and carbon filters that are completely independent of the heating and cooling systems. The system shall consist of an approximately 1,500 cfm inline fan with a charcoal filter. The system shall be mounted within the production room and one fan in each room shall include a system of ductwork and control dampers such that it can serve as an emergency exhaust system for the space. The air exhausted by the central ventilation systems will be exhausted through a filter bank generally consisting of 2" deep MERV-8 pre-filters and 12" deep carbon filters (to reduce odors), and all of the outside air provided by the central ventilation systems will be provided through a filter bank generally consisting of 2" deep MERV-8 pre-filters and 12" deep HEPA filters (to reduce the possibility of introducing contaminants from outside the building).

2. Facility Odor Emissions Information

a. Specific odor-emitting activities

Earth Well's cultivation and processing activities will generate odors that are reflective of the terpene profile of each phenotype that is grown or manufactured on site. Odors will first become distinguishable in the greenhouses as plants develop bud sites. Any associated aroma will be present throughout duration of the cultivation process and any subsequent manufacturing. Products will be packaged on site in odor-controlled materials.

b. Specific odor-controlled rooms

Earth Well anticipates the following rooms will require odor control:

- Mother / veg room
- Clone room
- Flowering room
- Trim room
- Dry room
- Processing rooms
- Vaults

c. Odor escape points

Earth Well has identified the following opportunities for odor escape and will proactively design to combat them:

- Ventilation openings and equipment penetrations along building perimeter,
- Exhaust locations, and
- Exterior doors along building perimeter.

3. Odor Mitigation Practices

a. Engineering Controls

Earth Well intends to install carbon filtration systems in each room that is designated an odor-control room. Carbon filtration systems utilize pellets of charcoal to trap terpenes as air passes through "carbon scrubbers" installed in the ducting. Earth Well may include engineering controls such as:

- Controlled exhaust ports that force air exiting the facility to pass through carbon filtration via low-volume exhaust fans;
- Air curtains mounted above exterior doors; and
- Sealing exterior equipment penetrations utilizing hydraulic cement or expandable foam.

As Earth Well identifies an appropriate vendor to offer industry-specific best control facilities, the applicant proposes to undertake the following initiatives prior to submitting for a building permit:

- 1) Submit information to demonstrate that the engineering control system and all components were reviewed and certified by a Professional Engineer or a Certified Industrial Hygienist as meeting professional expectations of competency and as sufficient to effectively mitigate odors for all odor sources.
- 2) Submit a process-specific maintenance plan including a description of the maintenance activities that will be performed, the frequency with which such activities will be performed, and the role/title(s) of the personnel responsible for maintenance activities. The activities will serve to maintain the odor mitigation system and optimize performance.
- 3) A timeline for implementation of the odor mitigation system.

b. Administrative Controls

1) Procedural activities

Building design and operations management has been optimized to restrict the flow of odor across the facility. Rooms that are odor-controlled will not have windows or other openings that allow for the release of air. Strict access control procedures including auditory notifications and weight mechanisms will be in place to ensure that doors

are not left open unintentionally or propped open for long periods of time.

2) Facility Design

Heavy duty doors with industrial grade closers will be installed. Marijuana odors will be prevented from escaping the confines of the building by keeping building perimeter doors closed while any interior doors are open.

3) Staff training materials

As part of the onboarding process, staff members will receive comprehensive training about standard operating procedures throughout the facility, including protocol relative to odor control. In addition to training about procedural activities, employees that work in designated odor-controlled areas will be trained to ensure exhaust and filtration systems are running appropriately.

4) Recordkeeping systems

Earth Well will maintain comprehensive records, including records of purchases of replacement carbon, performed maintenance tracking, documentation and notification of malfunctions, scheduled and performed training sessions, and monitoring of administrative and engineering controls.

4. Odor complaint tracking systems

Records of any odor complaints transmitted to the facility by the Town, local residents, or other parties will be maintained by Earth Well's staff and addressed immediately. All complaints will be reported to the Town's designated representative, Earth Well's General Manager, and the facility manager. The facility manager will be responsible for coordinating with on-site staff and executive management to remedy the problem and respond in writing.

Exhibit F: Energy Resource Plan

Earth Well seeks to implement the following proposed best management practices and energy efficiency features:

Water Management

Earth Well intends to utilize drip irrigation, which will ensure all water use is managed on an automated schedule and virtually eliminates excess water waste or runoff from the plants. This practice has been identified as a cultivation best practice by the Cannabis Control Commission in its "Guidance on Best Practices for Water Use".

Earth Well intends to utilize water recapture methods through drain pipes and lines, dehumidifiers, and condensation recapture modules. The recaptured water will be treated to prevent the growth and spread of microbial pathogens. Occasionally, the system will be flushed and new water will be introduced. Water that is not reused following system flushing will be collected and stored in a MassDEP certified holding tank (Transmittal Form DEP01) for disposal at an approved facility.

Waste Management

Organic material and recyclable material will be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans. To the greatest extent feasible, any recyclable material as defined in 310 CMR 16.02: *Definitions* will be recycled in a manner approved by the Commission. Any remaining marijuana waste will be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.

Earth Well intends to compost materials when possible. Earth Well will utilize biomass burners as a partial solution to self-heat its operations using renewable energy.

Solid waste containing cannabis waste will be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purposes. Once such cannabis waste has been rendered unusable, it will be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection.

Lighting

As required by the Cannabis Control Commission, the Lighting Power Densities ("LPD") for cultivation space will not exceed an average of 36 watts per gross square foot of active and growing space canopy. Earth Well intends to use LED lighting fixtures in vegetative rooms, saving up to 50% of lighting energy compared to standard practice. Earth Well intends to use double-ended high-pressure sodium ("HPS") fixtures in flower rooms, which save 20-25% of energy compared to standard HPS fixtures.

Cooling and Dehumidification

Earth Well intends to use a chilled water system to accomplish both cooling and dehumidification, with energy savings of up to 40% compared to the standard practice.

Building Envelope

The building envelope will meet minimum Massachusetts Building Code requirements and all Massachusetts amendments (780 CMR: State Building Code), International Energy Conservation Code (IECC) Section C.402 or The American Society of Heating, Refrigerating and Airconditioning Engineers (ASHRAE) Chapters 5.4 and 5.5 as applied or incorporated by reference in 780 CMR: State Building Code.

Strategies to Reduce Electric Demand

Earth Well proposes numerous vegetative and flower rooms to allow for fluctuating lighting schedules, reducing high demand periods.

Abutters Lists



Subject Properties:

CAMA Number:

CAMA Number:

Parcel Number: 21-CM1

CAMA Number: 21-008A

Property Address: 526A BOSTON POST RD

21-008B

Property Address: 526B BOSTON POST RD

Property Address: 526C BOSTON POST RD

Mailing Address: HDR HOLDINGS LLC

PO BOX 70

WAYLAND, MA 01778

Parcel Number: 21-CM1 Mailing Address: HDR HOLDINGS LLC

PO BOX 70

WAYLAND, MA 01778

Mailing Address: HDR HOLDINGS LLC Parcel Number: 21-CM1

21-008C PO BOX 70

WAYLAND, MA 01778

Mailing Address: HDR HOLDINGS LLC Parcel Number: 21-CM1

CAMA Number: 21-008D PO BOX 70

WAYLAND, MA 01778 Property Address: 526D BOSTON POST RD

Parcel Number: 21-CM1 Mailing Address: HDR HOLDINGS LLC

CAMA Number: 21-008E

Property Address: 526E BOSTON POST RD

PO BOX 70

WAYLAND, MA 01778

21-CM1 Parcel Number: Mailing Address: HDR HOLDINGS LLC

21-008F CAMA Number:

Property Address: 526F BOSTON POST RD

PO BOX 70

WAYLAND, MA 01778

Parcel Number: 21-CM1 Mailing Address: HDR HOLDINGS LLC

CAMA Number: 21-008G

Property Address: 526G BOSTON POST RD

PO BOX 70

WAYLAND, MA 01778

Parcel Number: 21-CM1

21-008H CAMA Number:

Property Address: 526H BOSTON POST RD

Mailing Address: HDR HOLDINGS LLC

PO BOX 70

WAYLAND, MA 01778

Parcel Number: 21-CM1 Mailing Address: HDR HOLDINGS LLC

CAMA Number: 21-008N

Property Address: 526N BOSTON POST RD

PO BOX 70

WAYLAND, MA 01778

Abutters:





300 foot Abutters List Report

Wayland, MA January 03, 2022

Parcel Number: 21-001 CAMA Number: 21-001

21-001 523 BOSTON POST

Property Address: 523 BOSTON POST RD

Parcel Number: 21-003 CAMA Number: 21-003

Property Address: 533 BOSTON POST RD

Parcel Number: 21-006

CAMA Number: 21-006

Property Address: 534 BOSTON POST RD

Parcel Number: 21-006A CAMA Number: 21-006A

Property Address: 528 BOSTON POST RD

Mailing Address: DEVINE JOSEPH TRUSTEE CUTTER C

THOMAS TRUSTEE 33 BOSTON POST RD SUDBURY, MA 01776

Mailing Address: HERB CHAMBERS 533 BOSTON POST

RD LLC % LAND ROVER SUDBURY

533 BOSTON POST RD WAYLAND, MA 01778

Mailing Address: WATERS EUGENIA B TRUSTEE GLASS

CARTER IV TRUSTEE 231 DESIMONE DR MARLBORO, MA 01752

Mailing Address: WATERS ROBERT A ESTATE OF

WATERS EUGENIA & CARTER GLASS

TRUSTEES

231 DESIMONE DR MARLBORO, MA 01752

abutters_id	abutters_owner1	abutters_owner2	abutters_address	abutters_tov a	abutte	abutters	abutters_boo	abutters_location
K07-0005	WELLYN INC	SUDB PLAZA C/O GRAVESTAR	160 SECOND ST	CAMBRIDGE I	MA	02142	1409-92	507 BOSTON POST RD
K07-0005	WELLYN INC	SUDB PLAZA C/O GRAVESTAR	160 SECOND ST	CAMBRIDGE I	MA	02142	1409-92	505 BOSTON POST RD
K07-0018	CHISWICK PARK LLC	C/O PARIS TRUST LLC	490-B BOSTON POST RD STE 201	SUDBURY 1	MA	01776	70761-291	490-B BOSTON POST RD
K07-0018	CHISWICK PARK LLC	C/O PARIS TRUST LLC	490-B BOSTON POST RD STE 201	SUDBURY 1	MA	01776	70761-291	490 BOSTON POST RD
K07-0018	CHISWICK PARK LLC	C/O PARIS TRUST LLC	490-B BOSTON POST RD STE 201	SUDBURY 1	MA	01776	70761-291	31 UNION AVE
K07-0018	CHISWICK PARK LLC	C/O PARIS TRUST LLC	490-B BOSTON POST RD STE 201	SUDBURY 1	MA	01776	70761-291	490-C BOSTON POST RD
K07-0103	MOY ADA & DANIEL		59 HIGHLAND AVE	SUDBURY 1	MA	01776	73377-574	59 HIGHLAND AVE
K07-0021	BPR DEVELOPMENT LLC	C/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	68592-43	534 BOSTON POST RD
K07-0021	BPR DEVELOPMENT LLC	CC/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	68592-43	536 BOSTON POST RD
K07-0022	BPR DEVELOPMENT LLC	C/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	69335-272	528 BOSTON POST RD UN
K07-0022	BPR DEVELOPMENT LLC	C/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	69335-272	526 BOSTON POST RD UN
K07-0022	BPR DEVELOPMENT LLC	CC/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	69335-272	530 BOSTON POST RD UN
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	140-149 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	270-279 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	203 BAY DR UNIT WWTP
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	230-234 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	220-226 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	150-159 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	180-187 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	160-167 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	210-213 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	200 BAY DR UNIT POOL H
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	120-129 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	110-119 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	310-313 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	201 BAY DR UNIT RECYCL
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	90-93 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	100-104 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	70-75 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	80-89 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VA	22203	69465-593	40-49 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON \	VΑ	22203	69465-593	1-16 BAY DR

K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	250-256 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	300-303 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	50-59 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	20-29 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	170-177 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	130-139 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	204 BAY DR UNIT BELTRA
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	60-69 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	190-197 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	30-39 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	280-289 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	290-299 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	200 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	202 BAY DR UNIT MAINT
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	240-245 BAY DR
K07-0023	SUDBURY AVALON INC	C/O AVALON COMMUNITIES	4040 WILSON BLVD SUITE 1000	ARLINGTON	VA	22203	69465-593	260-269 BAY DR
K07-0024	PULTE HOMES OF NEW		115 FLANDERS RD SUITE 200	WESTBOROU	MA	01581	70018-208	22 FARMSTEAD LN
K07-0025	SUDBURY SENIOR HOUS	C/O EPOCH SENIOR LIVING	51 SAWYER ROAD SUITE 500	WALTHAM	MA	02453	69466-1	1 FARMSTEAD LN UNIT BF
K07-0027	BPR DEVELOPMENT LLC	C/O NATIONAL DEVELOPMENT	2310 WASHINGTON ST	NEWTON LO	MA	02462	69335-272	0 ROADWAY UNIT ROADV
K07-0024-0	TICHNOR GEORGE M &	GORDON JUDITH F TRUSTEES	2 FARMSTEAD LN	SUDBURY	MA	01776	72182-533	2 FARMSTEAD LN
K07-0024-0	SHANKAR SAI L & KRISH		4 FARMSTEAD LN UNIT 2	SUDBURY	MA	01776	75133-436	4 FARMSTEAD LN
K07-0024-0	${\tt BALL\ JUDITH\ BARNES\ \&}$	COSTA MANUEL JOSEPH	6 FARMSTEAD LN	SUDBURY	MA	01776	71445-395	6 FARMSTEAD LN
K07-0024-0	DONOVAN DONNA M T	THE DONNA M DONOVAN REV	8 FARMSTEAD LN	SUDBURY	MA	01776	73081-129	8 FARMSTEAD LN
K07-0024-0	CASSARINO LINDA F		10 FARMSTEAD LN	SUDBURY	MA	01776	72079-526	10 FARMSTEAD LN
K07-0024-0	SILVERMAN KAY M	TRUSTEE SILVERMAN FAMILY TI	12 FARMSTEAD LN	SUDBURY	MA	01776	72290-197	12 FARMSTEAD LN
K07-0024-0	LIN JIA		14 FARMSTEAD LN	SUDBURY	MA	01776	72389-230	14 FARMSTEAD LN
K07-0024-0	ASCIONE ARLENE R	TRUSTEE OF ARLENE R ASCIONE	16 FARMSTEAD LN	SUDBURY	MA	01776	72691-286	16 FARMSTEAD LN
K07-0024-0	WENDEL MARY K		18 FARMSTEAD LN	SUDBURY	MA	01776	74124-134	18 FARMSTEAD LN
K07-0024-0	O'CONNOR DAVID F & I		20 FARMSTEAD LN	SUDBURY	MA	01776	72424-407	20 FARMSTEAD LN
K07-0024-0	VON PETERFFY ALEXAND	TRUSTEE OF A H VON PETERFFY	3 FARMSTEAD LN	SUDBURY	MA	01776	71777-1	3 FARMSTEAD LN
K07-0024-0	FONTE COLAFELLA JENN	ANGELO COLAFELLA TRUST	28 EDMANDS RD # 20	FRAMINGHA	MA	01701	71286-309	5 FARMSTEAD LN
K07-0024-0	PARKHILL CRAIG W TRU	THE CRAIG W PARKHILL REVOC	7 FARMSTEAD LN	SUDBURY	MA	01776	76629-467	7 FARMSTEAD LN
K07-0024-0	SINGH NEENA		9 FARMSTEAD LN	SUDBURY	MA	01776	71306-280	9 FARMSTEAD LN

K07-0024-C DEMARINES VICTOR M & MELINDA DEMARINES TR HIGH 11	L FARMSTEAD LN	SUDBURY N	//A 017	6 76084-322	11 FARMSTEAD LN
K07-0024-C MOORE SUSAN J	3 FARMSTEAD LN	SUDBURY N	//A 017	6 73517-220	13 FARMSTEAD LN
K07-0024-C RYAN THOMAS K & LISA 15	5 FARMSTEAD LN	SUDBURY N	//A 017	6 73312-563	15 FARMSTEAD LN
K07-0024-C DEMARINES VICTOR M {	7 FARMSTEAD LN	SUDBURY N	//A 017	6 72069-319	17 FARMSTEAD LN
K07-0024-C D`ANNOLFO FREDERICK D`ANNOLFO MARGUERITE 19) FARMSTEAD LN	SUDBURY N	//A 017	6 74008-32	19 FARMSTEAD LN
K07-0024-C AGRAWAL SATISH C & A 21	l farmstead ln	SUDBURY N	//A 017	6 72588-284	21 FARMSTEAD LN
K07-0024-C HANSON BRIDGET G & ICKLER CHRISTOPHER B 23	3 FARMSTEAD LN	SUDBURY N	//A 017	6 72498-147	23 FARMSTEAD LN
K07-0024-C MORCELLI GAYLE P 22	2 FARMSTEAD LN UNIT 101	SUDBURY N	//A 017	6 72602-21	22 FARMSTEAD LN UNIT 1
K07-0024-C CALABRIA RONALD A & 22	2 FARMSTEAD LN UNIT 102	SUDBURY N	//A 017	6 74474-491	22 FARMSTEAD LN UNIT 1
K07-0024-C DIKMAK ALBERT GEORG GEOGHEGAN CHRIS 22	2 FARMSTEAD LN UNIT 103	SUDBURY N	//A 017	6 74938-53	22 FARMSTEAD LN UNIT 1
K07-0024-C MCCABE PATRICK TRUS JOAN P MCCABE IRREVOCABLE 22	2 FARMSTEAD LN UNIT 104	SUDBURY N	//A 017	6 77961-496	22 FARMSTEAD LN UNIT 1
K07-0024-C MARTEL CHRISTOPHER 22	2 FARMSTEAD LN UNIT 105	SUDBURY N	//A 017	6 74188-107	22 FARMSTEAD LN UNIT 1
K07-0024-C CONE PETER F & JOYCE I TRUSTEES OF CONE FAMILY TRU22	2 FARMSTEAD LN UNIT 106	SUDBURY N	//A 017	6 72632-514	22 FARMSTEAD LN UNIT 1
K07-0024-C HORAN GAIL P & HORAN MATTHEW J 22	2 FARMSTEAD LN UNIT 107	SUDBURY N	//A 017	6 72899-292	22 FARMSTEAD LN UNIT 1
K07-0024-C ABRAHAM CATHERINE N CATHERINE M ABRAHAM 22	2 FARMSTEAD LN UNIT 108	SUDBURY N	//A 017	6 74818-217	22 FARMSTEAD LN UNIT 1
K07-0024-C WEIR WILLIAM N & HAE 22	2 FARMSTEAD LN UNIT 109	SUDBURY N	/A 017	6 73860-279	22 FARMSTEAD LN UNIT 1
K07-0024-C CHYTEN ALAN M & KEHAYOGLOU MARGARET TRU 22	2 FARMSTEAD LN UNIT 201	SUDBURY N	//A 017	6 72763-450	22 FARMSTEAD LN UNIT 2
K07-0024-C CELLI DENISE M 22	2 FARMSTEAD LN UNIT 202	SUDBURY N	//A 017	6 74932-429	22 FARMSTEAD LN UNIT 2
K07-0024-C KOH YUZUNG J & YI-FAN YUZUNG J KOH REVOCABLE TR 22	2 FARMSTEAD LN UNIT 203	SUDBURY N	//A 017	6 78821-545	22 FARMSTEAD LN UNIT 2
K07-0024-C BHAN KRISHEN K & LILA 22	2 FARMSTEAD LN UNIT 204	SUDBURY N	//A 017	6 74191-482	22 FARMSTEAD LN UNIT 2
K07-0024-C TERADA BETH A 22	2 FARMSTEAD LN UNIT 205	SUDBURY N	//A 017	6 75313-573	22 FARMSTEAD LN UNIT 2
K07-0024-C DENKER L AMBER TRUS L AMBER DENKER LIVING TRUS 22	2 FARMSTEAD LN UNIT 206	SUDBURY N	//A 017	6 74914-169	22 FARMSTEAD LN UNIT 2
K07-0024-C STONE ELLEN B 22	2 FARMSTEAD LN UNIT 207	SUDBURY N	//A 017	6 72699-57	22 FARMSTEAD LN UNIT 2
K07-0024-C CARLSON GILLIAN 22	2 FARMSTEAD LN UNIT 208	SUDBURY N	//A 017	6 73035-9	22 FARMSTEAD LN UNIT 2
K07-0024-C LIPSITZ JOSEPH ALAN & LIPSITZ-COHEN TOBA LEAH 22	2 FARMSTEAD LN UNIT 209	SUDBURY N	//A 017	6 73070-170	22 FARMSTEAD LN UNIT 2
K07-0024-C SEAMANS THOMAS F TR THOMAS F SEAMANS REVOCAB 22	2 FARMSTEAD LN UNIT 301	SUDBURY N	//A 017	6 74358-88	22 FARMSTEAD LN UNIT 3
K07-0024-C STUCCHI MICHAEL R & CLYNN M TRUSTEES ROBERT STU 22	2 FARMSTEAD LN UNIT 302	SUDBURY N	//A 017	6 73598-357	22 FARMSTEAD LN UNIT 3
K07-0024-C COHEN ALICE G & SCHMIDT SUSAN M 22	2 FARMSTEAD LN UNIT 303	SUDBURY N	//A 017	6 72561-291	22 FARMSTEAD LN UNIT 3
K07-0024-C GYAN NANIK D & PUSH 22	2 FARMSTEAD LN UNIT 304	SUDBURY N	//A 017	6 74285-282	22 FARMSTEAD LN UNIT 3
K07-0024-C CHEN PEI-YU 22	2 FARMSTEAD LN UNIT 305	SUDBURY N	//A 017	6 73195-528	22 FARMSTEAD LN UNIT 3
K07-0024-C GINSBERG GLORIA 22	2 FARMSTEAD LN UNIT 306	SUDBURY N	//A 017	6 73540-461	22 FARMSTEAD LN UNIT 3
K07-0024-C KNIGHT MICHAEL S 22	2 FARMSTEAD LN UNIT 307	SUDBURY N	/A 017	6 73526-327	22 FARMSTEAD LN UNIT 3
K07-0024-C RATKOWSKI ANTHONY J TRUSTEE ANTHONY J RATKOWS 22	2 FARMSTEAD LN UNIT 308	SUDBURY N	//A 017	6 72577-413	22 FARMSTEAD LN UNIT 3

K07-0024-C XIE RONG & YU YANG V	22 FARMSTEAD LN UNIT 309	SUDBURY MA	01776	73722-210	22 FARMSTEAD LN UNIT 3	
K07-0024-C DORJETS ALEXANDER &	22 FARMSTEAD LN UNIT 401	SUDBURY MA	01776	76226-115	22 FARMSTEAD LN UNIT 4	
K07-0024-C AKMAEVA NATALIA I	22 FARMSTEAD LN UNIT 402	SUDBURY MA	01776	73162-130	22 FARMSTEAD LN UNIT 4	
K07-0024-C KAO MARGARET TING	22 FARMSTEAD LN UNIT 403	SUDBURY MA	01776	72540-461	22 FARMSTEAD LN UNIT 4	
K07-0024-C LERNER JEFFREY B & ELIS	22 FARMSTEAD LN UNIT404	SUDBURY MA	01776	78082-453	22 FARMSTEAD LN UNIT 4	
K07-0024-C WAGNER JESS K TRUSTE JACQUELINE C WHYT	E & FRANK 22 FARMSTEAD LN UNIT 405	SUDBURY MA	01776	78661-205	22 FARMSTEAD LN UNIT 4	
K07-0024-C GRADY DAVID A & KILBANE MARJORIE A	22 FARMSTEAD LN UNIT 406	SUDBURY MA	01776	73344-235	22 FARMSTEAD LN UNIT 4	
K07-0024-C ZHOU ZHENG & ZHOU L	22 FARMSTEAD LN UNIT 407	SUDBURY MA	01776	75556-217	22 FARMSTEAD LN UNIT 4	
K07-0024-C ROSE KATHRYN & LAWR THE ROSE LIVING TRU	ST 23200 COPPERLEAF BLVD	BONITA SPRI FL	34135	75729-409	22 FARMSTEAD LN UNIT 4	
K07-0024-C WILLIAMSON RICHARD	22 FARMSTEAD LN UNIT 409	SUDBURY MA	01776	74899-1	22 FARMSTEAD LN UNIT 4	