

# HappyValley

**HVV Massachusetts, Inc.  
39 Country Club Way  
Ipswich, MA 01938**

June 20, 2018

Newburyport Office of Planning & Development  
Attn: Andrew Port, Director of Planning & Development  
Newburyport, MA 01950

**RE: Special Permit Application for 2 Opportunity Way, Newburyport, MA 01950**

Dear Mr. Port:

On behalf of HVV Massachusetts, Inc. I am submitting the attached application and documentation seeking a special permit for 2 Opportunity Way in Newburyport as Marijuana Establishment without Retail Sales to operate as a marijuana cultivator and marijuana product manufacturer.

1. A copy of application, registration, and/or certificate as a Marijuana Business from the Cannabis Control Commission (“CCC”) or Department of Public Health (“DPH”).
  - a. CCC Priority Applicant Approval
  - b. DPH name change from Happy Valley Ventures MA, Inc. to HVV Massachusetts, Inc.
  - c. DPH Provisional Certificate of Registration for the following locations:
    - i. 220 William McClellan Hwy, Boston, MA
    - ii. 38 Great Republic Drive, Gloucester, MA
    - iii. 422 Amity Street, Amherst, MA
2. Letter from current owner of property indicating approval of the proposed use and submission of Special Permit.
3. Detailed floor plan
4. Detailed site plan showing compliance, etc.
5. Security plan and employee policies
6. Waste disposal procedures.
7. Description and rendering of all signage
8. Traffic impact analysis
9. Documentation to back up adequacy of utilities on site for Water, Wastewater, Electricity
10. Memo addressing special permit requirements.
11. Completed Special Permit Application
12. Assessor’s Card
13. Plans and Drawings representing existing and proposed conditions.
14. Happy Valley Pesticide Information for Waste Water Permit.

We look forward to working with the City of Newburyport. Let me know if you have any questions or concerns regarding our application and supporting documentation.

Regards,



Michael D. Reardon  
HVV Massachusetts, Inc.

**City of Newburyport Planning Board  
Application for a SPECIAL PERMIT**

The undersigned hereby submits an application for:

- Special Permit
- Special Permit amendment

Petitioner: HVV MASSACHUSETTS, INC. (MICHAEL REARDON)  
Address: 39 COUNTRY CLUB WAY, IPSWICH, MA 01938  
Phone: (843) 819-0866  
Email: mreardon@happyvalleymj.com  
Owner: PORT DEVELOPMENT, LLC  
Address: 343 HIGH STREET, NEWBURYPORT, MA 01950  
Phone: (978) 869-6070

Site Address: 2 OPPORTUNITY WAY, NEWBURYPORT, MA 01950  
Assessor's Map and Lot(s): MAP ID: 82/A 24 Zoning District: I 1  
Book and Page #: 36084/0007 or Certificate of Title: \_\_\_\_\_

**Ordinance section where relief is being requested:**

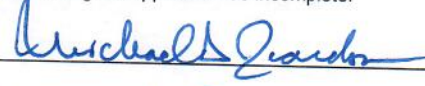
- |  |  |
|--|--|
| <input type="checkbox"/> Table of Permitted Uses (V-D)               | <input type="checkbox"/> Federal Street Overlay District (XXII)      |
| <input checked="" type="checkbox"/> Marijuana Overlay District (V-G) | <input type="checkbox"/> Courts and Lanes (XXIII)                    |
| <input type="checkbox"/> One residential structure per lot (VI.C)    | <input type="checkbox"/> Waterfront West Overlay District (XXIV)     |
| <input type="checkbox"/> Open Space Residential Development (XIV)    | <input type="checkbox"/> Towle Complex Redev. Overlay District (XXV) |
| <input type="checkbox"/> Water Resource Protection District (XIX)    |  |

**Describe the Special Permit request:**

WE SEEK A SPECIAL PERMIT AS A "MARIJUANA ESTABLISHMENT WITHOUT RETAIL SALES" TO OPERATE AS A MARIJUANA CULTIVATOR AND MARIJUANA PRODUCT MANUFACTURER.

**Petitioner and Landowner signature(s):**

Every application for a Special Permit shall be made on this form, which is the official form of the Planning Board. It shall be the responsibility of the petitioner to furnish all supporting documentation with this application. The dated copy of this application received by the City Clerk or Office of Planning and Development does not absolve the applicant from this responsibility. Failure to comply with application requirements as cited herein may result in the Planning Board dismissing the application as incomplete.

Signature of petitioner/owner: 

Print name(s) here: MICHAEL D. REARDON

**City of Newburyport Planning Board**  
**Instructions for an Application for a SPECIAL PERMIT**

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**Instructions:** The petitioner must submit one (1) .pdf and two (2) hard copies of the following information:

- a.  Completed Special Permit application form
- b.  Zoning Review form from the Zoning Administrator indicating the need for a Planning Board Special Permit
- c.  Pursuant to M.G.L.s Ch. 40A Section 6 and the City's Zoning Ordinance Section X.H.7 Special Permits, the applicant must include a memo addressing the following Special Permit requirements:
- a) The use requested is listed in the table of use regulations or elsewhere as in the ordinances requiring a Special Permit in the district for which application is made or is similar in character to permitted uses in a particular district but is not specifically mentioned.
  - b) The requested use is essential and/or desirable to the public convenience or welfare.
  - c) The requested use will not create undue traffic congestion, or unduly impair pedestrian safety.
  - d) The requested use will not overload any public water, drainage, or sewer system or any other municipal system to such an extent that the requested use or any developed use in the immediate area or in any other area of the city will be unduly subjected to hazards affecting health, safety, or the general welfare.
  - e) Any special regulations for the use set forth in the special permit table, if any, are fulfilled.
  - f) The requested use will not impair the integrity or character of the district or adjoining districts, nor be detrimental to the health or welfare.
  - g) The requested use will not, by its addition to a neighborhood, cause an excess of that particular use that could be detrimental to the character of said neighborhood.
  - h) The proposed use is in harmony with the purpose and intent of this ordinance.
  - i) The proposed use shall not be conducted in a manner as to emit any dangerous, noxious, injurious or otherwise objectionable fire, explosion, radioactive or other hazard, noise or vibration, smoke, dust, odor or other form of environmental pollution.
- d.  Assessor's Card available from the Assessor's Office or from <http://gis.vgsi.com/newburyportma/>
- e.  Plans and drawings clearly representing existing and proposed conditions. *Plan(s) shall include all the following requirements:*
- North point, Date of Plan; Title of Plan, Location Address; Graphic Scale
  - Zoning district(s) and dimensional control requirements;
  - Wetlands (if applicable);
  - Property boundaries; locations of buildings on adjacent properties and dimensional setbacks from property lines;
  - Indicate the proposed dimensional setbacks of the proposed structure with the existing structure(s) dimensional controls;
  - Deed restrictions, easements, etc.;
  - Proposed features in solid lines; Features that are to be removed in dashed lines;
  - Name, address, and phone numbers of the Applicant, Owner, Designer, Engineer, or Surveyor.
- f.  Any other supplemental information such as memos, letters of support, photos, etc.

**Filing fees:** An administrative fee of \$200.00 plus a Publication and Abutters fee of \$350 is required at the time of application. Fees may be combined into one check made payable to the "City of Newburyport."

**Memo Addressing Special Permit Requirements:**

1. Petitioner CONFIRMS that the use requested is listed in the table of use regulations or elsewhere in the ordinances requiring a special permit.
2. The requested use is desirable to public welfare and convenience by manufacturing cannabis wellness products that can be used for medicinal or recreational purposes.
3. Petitioner CONFIRMS that the requested use will not create undue traffic congestion, or unduly impair pedestrian safety.
4. Petitioner CONFIRMS that the requested use will not overload public water, drainage or sewer systems or any other municipal system, nor will the city be unduly subjected to hazards effecting health, safety and general welfare.
5. Petitioner CONFIRMS that all special regulations set forth in the special permit table will be fulfilled.
6. Petitioner CONFIRMS that the requested use will not impair the integrity or character of the zoning district or adjoining districts, nor will it be detrimental to the health or welfare or cause an excess of the use.
7. Petitioner CONFIRMS that the proposed use as an indoor agriculture and manufacturing facility is in harmony with the purpose and intent of the ordinance.
8. Petitioner CONFIRMS that the proposed use shall not emit any dangerous, noxious, injurious or otherwise objectionable fire, explosion, radioactive or other hazard, noise or vibration, smoke, dust, odor or other form of environmental pollution.



## PORT DEVELOPMENT, LLC

May 30, 2018

City of Newburyport  
Planning Board  
Bonnie Sontag, Chair  
60 Pleasant Street  
Newburyport, MA 01950

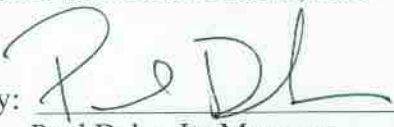
Re: Special Permit Filing – 2 Opportunity Way, Newburyport MA

Dear Ms. Sontag:

As Manager of Port Development, LLC, and the owner of the property located at 2 Opportunity Way, Newburyport, MA 01950 I can confirm that the property is in fact under contract to be sold to HVV Newburyport, LLC. Furthermore, I approve the filing of a Special Permit by HVV Newburyport, LLC in connection with its use of the property at 2 Opportunity Way, Newburyport, MA 01950 as a marijuana cultivator and product manufacturer.

Very truly yours,

PORT DEVELOPMENT, LLC

By:   
Paul Dahn, Its Manager

343 High Street  
Newburyport, MA 01950  
Phone: (978) 869-6070 Fax: (978) 478-4590

The.  
**Morin-Cameron**  
GROUP, INC.

Engineers • Surveyors  
Environmental Consultants • Land Use Planners  
66 Elm Street  
Danvers, MA 01923  
[www.morincameron.com](http://www.morincameron.com)  
978-777-8586  
FAX 978-774-3488

# Memo

To: Newburyport Planning Board

From: Stephen Sawyer P.E.

CC: Micheal Reardon- Happy Valley

Date: June 19, 2018

Re: Traffic Analysis and Parking Memorandum

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The proposed redevelopment of 2 Opportunity Way from the previous Home-Made Brand Foods use as bulk and pre-packaged food preparation facility to the use as Marijuana Establishment without retail sales will render a substantial reduction in traffic associated with the subject property. The previous use was labor intensive with substantially more vehicle trip attributed to employees. The previous use also required a substantial demand of large tractor trailer trucking to accommodate the bulk and pre-packed food deliveries. The proposed marijuana cultivation facility has 70 total employees with a maximum shift of 42 employees. This will generate approximately 150 vehicle trips per day. The product tucking/delivery schedule is a fraction of the previous use at the property. The traffic generated by the proposed used would have no impact of the Level of Service and can easily be accommodated by the surrounding roadway network within the Newburyport Business Park.

The parking demand can easily be accommodated with the current parking spaces on the property. The Zoning Use for a Marijuana Establishment without retail sales requires 0.75 spaces per maximum shift employee plus 1 per company vehicle. With 42 maximum shift employees and 2 company vehicles there are 34 required spaces. The property currently has 50 parking spaces available.

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# Memo

To: Newburyport Planning Board  
From: Stephen Sawyer P.E.  
CC: Micheal Reardon- Happy Valley  
Date: June 19, 2018  
Re: Water and Sewer Demand

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Water Demand -The Proposed Marijuana Cultivation facility will have a total daily demand of 11,775 gallons per day. This use is spread evenly throughout the day with no peaking factor rendering a peak demand of 8-10 gallons per minute. This peak demand can easily be accommodated by the industrial park water main network. The building is serviced by a 3" diameter water service and 6" fire service. Both are of ample diameter to fully service the proposed use..

Sewer Demand- Given the proposed use as a Marijuana Cultivation facility the sewer demand less than the water use and is only 6,005 gallons per day. This proposed demand is less than the previous Home-Made Brand Foods demand of 6,450 gallon per day. Also, the previous use had a much higher BOD and grease concentration associated with food preparation. The proposed use will reduce the demand on the municipal system verses that of the previous food preparation use.



**VETERAN**  
**DESIGN & CONSTRUCTION, INC.**

*A Service Disabled Veteran Owned Small Business*

June 19, 2018

Office of Planning and Development  
City of Newburyport  
60 Pleasant Street  
Newburyport, MA 01950

ATTN: Andrew R. Port  
Director of Planning and Development

Re: 2 Opportunity Way, Newburyport, MA – Adequacy of Electrical Service

Mr. Port,

Veteran Design & Construction, Inc. (VDCI) is the mechanical, electrical, and plumbing engineering firm for the planned building renovation at 2 Opportunity Way in Newburyport, MA. We have worked with National Grid on prior projects in MA. We are writing this letter to offer our professional opinion on the adequacy of the existing electrical power requirements.

We understand the existing facility is currently provided with a 2,000 amp, 480 volt service. Having been the design engineer of record on numerous facilities of this size and scope, including one with Mr. Reardon in Gloucester, MA, we feel that this primary service will be adequate for the proposed capacity requirements.

We contacted a National Grid representative regarding the electrical load of the project. As in all other cases, National Grid will analyze the loads and the existing transformer. VDCI will design the changes to the existing switchboard and the distributed power through the building. Based on our understanding, we believe National Grid will be able to provide sufficient capacity to support the building.

Very Truly Yours,

*VETERAN DESIGN & CONSTRUCTION, INC.*

Nicholas Hienz, PE  
Vice President

Cc: Michael Reardon

5523 Research Park Drive, Suite 110, Baltimore, Maryland 21228

*A Service Disabled Veteran Owned Company*

Tel: 443.543.5081 Fax: 443.543.5086

[www.Veteran-DCI.com](http://www.Veteran-DCI.com)



CURRENT OWNER		TOPO.	UTILITIES	STRT./ROAD	LOCATION	CURRENT ASSESSMENT					
PORT DEVELOPMENT LLC C/O DAHN 343 HIGH ST						Description	Code	Appraised Value	Assessed Value	123 NEWBURYPORT, MA	
NEWBURYPORT, MA 01950						INDUSTR.	4010	3,811,500	3,811,500		
Additional Owners:						IND LAND	4010	550,200	550,200		
SUPPLEMENTAL DATA						INDUSTR.	4010	74,500	74,500	<b>VISION</b>	
Other ID: 82A-24		CONDO CV:									
SUB-DIV		INLAW Y/N:									
PHOTO		LOT SPLIT:									
WARD 4		40B HSNG:									
TILE #:		ASSOC PID#									
ATT 1/2 HSE:											
GIS ID: M_249715_950218											
						Total		4,436,200	4,436,200		

RECORD OF OWNERSHIP		BK-VOL/PAGE	SALE DATE	q/u	v/i	SALE PRICE	V.C.	PREVIOUS ASSESSMENTS (HISTORY)								
PORT DEVELOPMENT LLC		36084/0007	08/08/2017	Q	I	4,500,000	00	Yr.	Code	Assessed Value	Yr.	Code	Assessed Value	Yr.	Code	Assessed Value
HMBF05 NEWBURYPORT MA LLC		24998/0315	10/26/2005	U	I	7,800,000	1C	2018	4010	3,811,500	2017	4010	3,811,500	2016	4010	3,761,400
PALMIERI & WALTERS, INC.		11834 0384	04/20/1993	Q	V	180,000	00	2018	4010	550,200	2017	4010	523,600	2016	4010	498,700
N A I D		07108/0137	05/12/1983		V	0		2018	4010	74,500	2017	4010	74,500	2016	4010	74,500
						Total:		4,436,200	Total:	4,409,600	Total:	4,334,600	Total:	4,334,600	Total:	4,334,600

EXEMPTIONS				OTHER ASSESSMENTS				APPRAISED VALUE SUMMARY				
Year	Type	Description	Amount	Code	Description	Number	Amount	Comm. Int.	This signature acknowledges a visit by a Data Collector or Assessor			
Total:								Appraised Bldg. Value (Card)				2,506,000
								Appraised XF (B) Value (Bldg)				1,305,500
								Appraised OB (L) Value (Bldg)				74,500
								Appraised Land Value (Bldg)				550,200
								Special Land Value				0
								Total Appraised Parcel Value				4,436,200
								Valuation Method:				C
								Adjustment:				0
								Net Total Appraised Parcel Value				4,436,200

ASSESSING NEIGHBORHOOD		NBHD/ SUB		NBHD Name		Street Index Name		Tracing		Batch	
I/A											

NOTES											
GRENCORE USA - FORMERLY KNOWN AS						HAS 2 FREIGHT ELEVATORS, EACH HAS					
HOMEMADE BRAND FOODS						5000 LBS CAP					
MULTI SIZE MEZ1,2 + 3 THRU-OUT BLDG						78'X150' ADDITION=COOLER					
AOF HAS CENTRAL A/C						28'X85' ADDITION=UNHEATED WRHSE					
ROOF PLATFORM FOR REFRIGERATION IS COMP											
AOF = SECOND LEVEL OFICES											

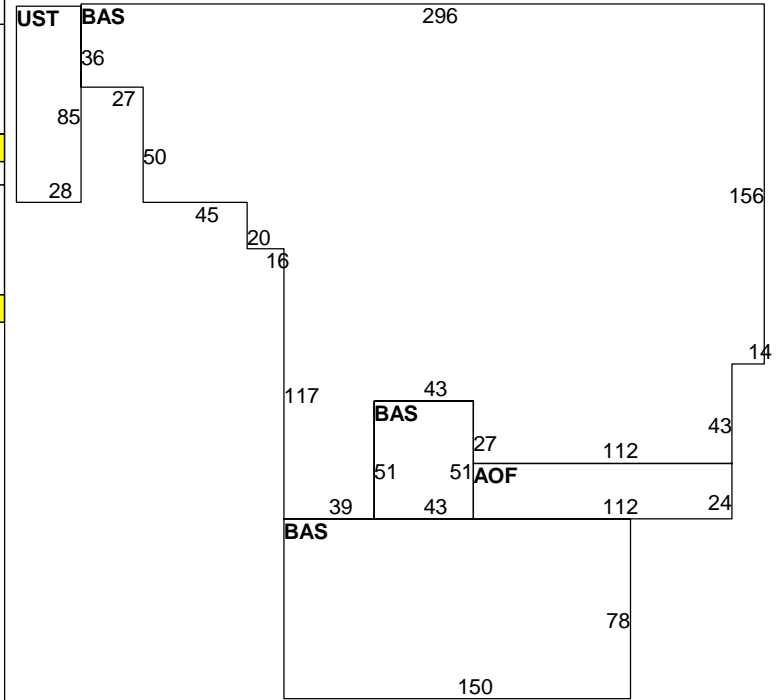
BUILDING PERMIT RECORD										VISIT/ CHANGE HISTORY					
Permit ID	Issue Date	Type	Description	Amount	Insp. Date	% Comp.	Date Comp.	Comments	Date	Type	IS	ID	Cd.	Purpose/Result	
A-2016-114	03/16/2016	IN	Industrial	80,000		0		CONTRACTOR TO PE	05/18/2017			DG	50	Building Permit	
A/R 11-336	08/29/2011	IN	Industrial	82,157		100		SELECTIVE INTERIO	08/04/2016			DG	50	Building Permit	
A/R 10-124	04/21/2010	IN	Industrial	2,529,711	09/14/2011	100	07/01/2011	RMDL 1ST FL PRODU	09/14/2011			DG	00	Measur+Listed	
A/R 10-10	01/21/2010	IN	Industrial	379,151	08/11/2010	100	08/11/2010	INT REMODEL 1ST &	08/11/2010			PM	00	Measur+Listed	
A/R 09-482	11/23/2009	IN	Industrial	16,000	08/11/2010	100	08/11/2010	INT DEMO	07/27/2009			CN	00	Measur+Listed	
A/R 09-189	06/17/2009	IN	Industrial	58,200	07/27/2009	100	07/01/2009	RETROFIT ROOF SYS							
A/R 09-87	04/13/2009	IN	Industrial	67,000	07/27/2009	100	07/01/2009	INTERIOR RENOVATI							

LAND LINE VALUATION SECTION																			
B #	Use Code	Use Description	Zone	D	Front	Depth	Units	Unit Price	I. Factor	S.A.	Acre Disc	C. Factor	ST. Idx	Adj.	Notes- Adj	Special Pricing	S Adj Fact	Adj. Unit Price	Land Value
1	4010	IND WHSES	II				43,560 SF	6.62	1.0000	I	1.0000	1.00	C19	0.60			1.00	3.97	173,000
1	4010	IND WHSES	II				2.00 AC	288,400.00	1.0000	I	1.0000	1.00	C19	0.60			1.00	173,040.00	346,100
1	4010	IND WHSES	II				1.08 AC	288,400.00	1.0000	I	1.0000	0.10		0.00	EXCESS		1.00	28,840.00	31,100

CONSTRUCTION DETAIL				CONSTRUCTION DETAIL (CONTINUED)			
Element	Cd.	Ch.	Description	Element	Cd.	Ch.	Description
Style	96		Office/Warehs				
Model	96		Industrial				
Grade	03		Average				
Stories	1						
Occupancy	1						
Exterior Wall 1	17		Stucco/Masonry				
Exterior Wall 2	27		Pre-finish Metl				
Roof Structure	03		Gable/Hip				
Roof Cover	01		Metal/Tin				
Interior Wall 1	06		Cust Wd Panel				
Interior Wall 2							
Interior Floor 1	04		Concr Abv Grad				
Interior Floor 2							
Heating Fuel	03		Gas				
Heating Type	04		Forced Air-Duc				
AC Type	03		Central				
Bldg Use	4010		IND WHSES				
Total Rooms							
Total Bedrms							
Total Baths							
Kitchen Grd							
Heat/AC	00		NONE				
Frame Type	05		STEEL				
Baths/Plumbing	02		AVERAGE				
Ceiling/Wall	04		CEIL & MIN WL				
Rooms/Prtns	02		AVERAGE				
Wall Height	26						
% Comn Wall	0						

MIXED USE		
Code	Description	Percentage
4010	IND WHSES	100

COST/MARKET VALUATION		
Adj. Base Rate:		49.85
Replace Cost		3,297,328
AYB		1994
EYB		2005
Dep Code		A
Remodel Rating		
Year Remodeled		
Dep %		24
Functional Obslnc		
External Obslnc		
Cost Trend Factor		1
Condition		UC
% Complete		76
Overall % Cond		76
Apprais Val		2,506,000
Dep % Ovr		0
Dep Ovr Comment		
Misc Imp Ovr		0
Misc Imp Ovr Comment		
Cost to Cure Ovr		0
Cost to Cure Ovr Comment		



**OB-OUTBUILDING & YARD ITEMS(L) / XF-BUILDING EXTRA FEATURES(B)**

Code	Description	Sub	Sub Descript	L/B	Units	Unit Price	Yr	Gde	Dp Rt	Cnd	%Cnd	Apr Value
PAV1	PAVING-ASPH			L	36,000	2.30	1998		0		90	74,500
SPR1	SPRINKLERS			B	48,000	2.70	2005		2		100	98,500
SPR2	WET/CONCE			B	3,400	3.80	2005		2		100	9,800
LDL1	LOAD LEVEL			B	8	5,519.00	2005		2		100	33,600
CLR1	COOLER			B	8,740	109.00	2005		2		100	724,000
MEZ1	MEZZANINE-			B	10,960	19.00	2005		2		100	158,300
MEZ3	W/PARTITION			B	2,304	45.00	2005		2		100	78,800
MEZ2	FINISHED			B	288	34.00	2005		2		100	7,400
ELV2	ELEVATOR C			B	1	77,000.00	2005		2		100	58,500

**BUILDING SUB-AREA SUMMARY SECTION**

Code	Description	Living Area	Gross Area	Eff. Area	Unit Cost	Undeprec. Value
AOF	Office	2,688	2,688	4,435	82.25	221,085
BAS	First Floor	60,996	60,996	60,996	49.85	3,040,651
UST	Utility, Storage, Unfinished	0	2,380	714	14.96	35,593



2016/08/04

<b>Ttl. Gross Liv/Lease Area:</b>	63,684	66,064	66,145	3,297,328
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CURRENT OWNER		TOPO.	UTILITIES	STRT./ROAD	LOCATION	CURRENT ASSESSMENT			
PORT DEVELOPMENT LLC C/O DAHN 343 HIGH ST						Description	Code	Appraised Value	Assessed Value
NEWBURYPORT, MA 01950 Additional Owners:		SUPPLEMENTAL DATA							
Other ID: 82A-24		ASSOC PID#							
GIS ID: M_249715_950218					Total:		4,436,200	4,436,200	

123  
NEWBURYPORT, MA

**VISION**

RECORD OF OWNERSHIP						BK-VOL/PAGE	SALE DATE	q/u	v/i	SALE PRICE	V.C.	PREVIOUS ASSESSMENTS (HISTORY)					
Yr.	Code	Assessed Value	Yr.	Code	Assessed Value	Yr.	Code	Assessed Value	Yr.	Code	Assessed Value	Total:			Total:		

EXEMPTIONS				OTHER ASSESSMENTS				
Year	Type	Description	Amount	Code	Description	Number	Amount	Comm. Int.
Total:								

This signature acknowledges a visit by a Data Collector or Assessor

ASSESSING NEIGHBORHOOD				
NBHD/ SUB	NBHD Name	Street Index Name	Tracing	Batch
I/A				

APPRAISED VALUE SUMMARY	
Appraised Bldg. Value (Card)	2,506,000
Appraised XF (B) Value (Bldg)	1,305,500
Appraised OB (L) Value (Bldg)	74,500
Appraised Land Value (Bldg)	550,200
Special Land Value	0
Total Appraised Parcel Value	4,436,200
Valuation Method:	C
Adjustment:	0
<b>Net Total Appraised Parcel Value</b>	<b>4,436,200</b>

NOTES				

BUILDING PERMIT RECORD										VISIT/ CHANGE HISTORY					
Permit ID	Issue Date	Type	Description	Amount	Insp. Date	% Comp.	Date Comp.	Comments	Date	Type	IS	ID	Cd.	Purpose/Result	

LAND LINE VALUATION SECTION																		
B #	Use Code	Use Description	Zone	D	Front	Depth	Units	Unit Price	I. Factor	S.A.	C. Factor	ST. Idx	Adj.	Notes- Adj	Special Pricing	S Adj Fact	Adj. Unit Price	Land Value

CONSTRUCTION DETAIL				CONSTRUCTION DETAIL (CONTINUED)			
Element	Cd.	Ch.	Description	Element	Cd.	Ch.	Description
<b>MIXED USE</b>							
<i>Code</i>	<i>Description</i>		<i>Percentage</i>				
4010	IND WHSES		100				
<b>COST/MARKET VALUATION</b>							
Cost Trend Factor							

**OB-OUTBUILDING & YARD ITEMS(L) / XF-BUILDING EXTRA FEATURES(B)**

Code	Description	Sub	Sub Descript	L/B	Units	Unit Price	Yr	Gde	Dp Rt	Cnd	%Cnd	Apr Value
ELV2	ELEVATOR C			B	1	77,000.00	2005		2		100	58,500
A/C	AIR CONDITI			B	2,688	1.50	2005		2		100	3,100
MEZ3	W/PARTITION			B	2,193	45.00	2005		2		100	75,000

No Photo On Record

**BUILDING SUB-AREA SUMMARY SECTION**

Code	Description	Living Area	Gross Area	Eff. Area	Unit Cost	Undeprec. Value
Ttl. Gross Liv/Lease Area:						
		0	0	0		3,297,328

# HappyValley

## Waste Disposal Plan

Exhibit 725.105(J): Policies and procedures for liquid and solid waste disposal.

Exhibit 725.105(B)(1)(d), 725.105(C)(6)(j), 725.105(J): Policies and procedures for the storage, usage, and disposal of chemicals and solvents

### Introduction:

Happy Valley has outlined the following protocols and procedures relating to the collection and disposal of waste resulting from the production, processing, testing, and dispensing of cannabis. This includes procedures specific to cannabis waste and procedures for other waste categories that will be generated through the operation of the proposed facility.

The operating procedures for management and disposal of cannabis waste are detailed processes that will require diligence, along with daily maintenance and recordkeeping from all facility staff who encounter this type of waste. Following State rules and regulations, and under the guidance of our cultivation consultant, MJardin, Happy Valley has adopted Standard Operating Procedures (SOPs) to meet the requirements of the regulations and organized the following outline to address all areas of its waste management plan.

Happy Valley has also taken the initiative to review the “Managing Pharmaceutical Waste, a 10-Step Blueprint for Healthcare Facilities in the United States”; Revised August 2008. This document is a best practices study, funded by the United States Environmental Protection Agency. The Happy Valley also reviewed the following documents and guidelines provided by the U. S. Drug Enforcement Agency:

Drug Disposal Fact Sheets - Collectively:

- Disposal Regulations: Registrant Fact Sheet (PDF)
- Disposal Act: General Public Fact Sheet (PDF)
- Disposal Act: Long Term Care Facility Fact Sheet (PDF)
- Webinar for Community Agencies: The DEA's Final Rule on Disposal of Controlled Substances
- Non-DEA Registrant (General Public) Drug Disposal
- Search for an Authorized Collector Location
- Got Drugs? - National Prescription Drug Take-Back Day
- FDA - How to Dispose of Unused Medicines
- FDA - Disposal of Unused Medicines
- EPA - How to Dispose of Medicines Properly (PDF)

Happy Valley will make the complete set of SOPs for the procedures described below available to the Department of Public Safety upon request or during any inspection of the site and facility.

## Compliance

Happy Valley understands its responsibility to prevent diversion and maintain accountability of its waste. Happy Valley will dispose of all waste categories generated in compliance with applicable state and local laws and regulations, and Code of Federal Regulation, Title 21, Part 1317, Subpart C. This includes compliance with applicable municipal regulations. Happy Valley understands that any waste materials containing cannabis, raw materials, and/or by-products created by the production or cultivation of cannabis must be rendered irretrievable, as defined in Code of Federal Regulations, Title 21, Part 1300. In addition, waste water generated during production and processing will be disposed of in compliance with applicable state and local laws.

- Happy Valley will determine whether specific waste materials or waste water constitute hazardous waste under applicable federal or state regulations, and will ensure disposal of any such waste complies with applicable disposal regulations.
- Happy Valley will store waste materials on its premises prior to destruction and disposal.
- Happy Valley will maintain records of any disposal or destruction of waste materials resulting from cultivating, processing, or dispensing THC cannabis for at least two years.
- Happy Valley will retain shipping invoices, log books, records of duty status if applicable, delivery records and manifests reflecting the recipient's acknowledgment and establishing the chain of custody, relating to the transportation of waste material resulting from cultivation, processing, or dispensing of cannabis.
- Happy Valley understands that only cannabis may be dispensed or sold, and that all by-products must be destroyed.

## Tracking, Collection, and Disposal of THC cannabis Waste

### Identification of THC cannabis Waste Control Points

To prevent diversion and ensure proper tracking and disposal of cannabis waste and waste by-products, generated throughout the production and manufacturing process, Happy Valley has identified the following control points that may result in regulated waste disposal actions.

#### i. *Waste Control Points Diagram*

The diagram below outlines the major control points in the cultivation and processing processes:

#### ii. *Waste Control Points Description*

- Each control points functions as a stop-gap to weigh the outputs of the previous process operation prior to initiating the next one. Any mass lost during the previous process is recorded, as well as any waste products that will not be transferred to the next operation. Control Points A and B: The Clone and Vegetative stages require unhealthy plants and/or cuttings to be culled, weighed, disposed of in the proper receptacle.
- Control Point C: The Flower Stage requires additional pruning events. As plants are pruned, all green waste is put immediately into the proper receptacle.
- Control Point D: Harvest involves the shucking of fan leaves, SOP mandate that all green waste be removed during this process placed directly into a green waste receptacle.

- Control Point E: When the Dry Room is cleaned (following the removal of harvested product), minimal green waste can be found.
- Control Point F: In the Processing/Extraction Phase, the removal of additional leaves, stalks, stems, and any other undesirable plant material occurs prior to loading the extractors. All material not loaded into the extraction operation will be separated, weighed, recorded, and placed into the proper receptacle. Following extraction, the spent feed stock material will be weighed, recorded and disposed of accordingly. All chemical waste generated by the purification processes are placed in appropriate hazardous waste satellite accumulation areas. Finished concentrates are recorded and transferred to manufacturing processes upon receiving clearance from Quality Control/Assurance (Testing).
- Control Point G: Utilization of concentrates in finished dose-able products will result in residual losses from containers and transfer materials. All material is weighed before handling and at post production to determine residual losses. These are disposed of as hazardous waste described elsewhere. There may also be losses due to defective products (not meeting quality control standards) and will be recorded and disposed of as described elsewhere.

For all control points above, any cannabis waste is mixed at a 1:1 waste-media ratio, and must be securely locked into dumpsters and readied for pickup.

### Cannabis Waste Collection and Tracking

#### iii. *Purpose*

To facilitate the tracking and prevent the diversion of cannabis waste, Happy Valley will require that all cannabis waste collected throughout the work day be weighed, logged, and held separately from all other waste types for compliant destruction at the end of the workday. In addition to logging all cannabis waste on tracking sheets, as described below, cannabis will also be logged in the inventory control system.

#### iv. *General Procedures*

All staff tasked with activities that will require them to carry out the collection, tracking, and/or disposal of cannabis waste materials will be thoroughly trained as part of their core training program and monitored for adherence to the procedures outlined. Staff will be required to read the cultivation and processing SOPs in entirety and to take the relevant MJardin University courses, which include training in proper waste disposal techniques.

To ensure proper cannabis waste disposal, waste containers, specific to this waste category, will be located throughout the facility and will be clearly labeled for this use. These waste containers will typically consist of strategically placed, standard 42-gallon waste containers, clearly labeled for cannabis waste only. Smaller, identically labeled, receptacles may be placed, as needed, in areas of the facility that require them, these will be used to house waste until it can be transferred to a larger waste container.

Employees will be trained to strictly adhere to a policy of promptly disposing of all cannabis waste and only use labeled waste receptacles for cannabis waste. All such waste containers will be sanitized on a weekly basis to avoid the spread of pathogens.

#### *v. Tracking*

Waste containers, used for the collection of cannabis waste, will be accompanied by log sheets used to track the waste placed into them.

These log sheets will contain fields used to track the following information

- Date of waste disposal
- Time of waste disposal
- Weight of the waste
- Description of waste (I.E. plant parts, by-product, etc.)
- Facility area the waste came from
- Specific plant tag(s) number(s) and or batch, harvest batch, oil batch, etc. that the waste is tied to

Prior to placing the waste into the receptacle, employees will be required to weigh the waste and to record the weight along with all other required information on the log. All such waste log records will be collected periodically, filed in the office, held on site and made available for copy or inspection for at least two years.

In addition to the maintenance of the physical logs described above, cannabis waste will also be tracked in the computerized inventory control system used by Happy Valley. Inventory management specialists or any other employees authorized to access the system, will log all waste generated into this system. The physical logs described will be referenced to the system daily, ensuring that all physical entries are integrated into the inventory control system.

#### *vi. Special Considerations for cannabis waste generated via extraction and testing operations*

##### *1. Introduction*

Cannabis waste, generated by extraction, testing, and manufacturing operations at this facility will comprise several physical forms of hazardous and non-hazardous waste, containing low-cannabinoid contents. Waste may also include products returned by customers, materials collected under a recall order from the State of Massachusetts, or unusable products from normal manufacturing processes due to failing quality control standards.

On a mass basis, the predominant form of waste generated during these operations is considered non-hazardous biological waste. This is comprised of post-extracted feedstock, i.e., marijuana plant material, including leaves and flower, that has been subjected to medical marijuana extraction processes; the other contribution being unprocessed, unusable, plant material, having very low cannabinoid content.

Each extraction and testing operation includes a specific Waste Management SOP relevant to that operation. These SOPs detail storage and disposal procedures for hazardous waste generated during these processes, in addition to complying with the overall, cannabis, waste procedures detailed above.

##### *2. Non-Hazardous Biological Waste Generated through Extraction and Testing Operations*



This category of waste includes post-extraction feedstock and all unusable plant materials. Post-extract material is removed from the extraction units and transferred into a 42-gallon waste container. A single waste container and dolly will be stored in, or adjacent to the extraction room, to facilitate easy retrieval and extractor clean-out. Each addition to the waste container, from a given lot, will cause its corresponding record in the inventory tracking system to be updated to indicate that it has been processed and transferred to the waste storage. Once the waste container is full, or at the end of the work day, the material will be rendered unrecognizable as described in the onsite destruction section below.

### 3. *Hazardous Waste Generated Through Extraction and Testing of Cannabis*

Chemical waste, generated through the extraction and testing of cannabis, often contains trace amounts of cannabinoids. All waste generated by extraction, purification, testing and manufacturing containing hazardous chemicals will be treated as hazardous chemical waste and disposed of accordingly to its SDS, along with local and federal regulations. Specifically, materials may be dissolved in water and/or ethanol as required to provide complete dissolution, and then disposed of as cannabinoid-containing ethanol/aqueous hazardous waste. Any nitrates, oxidizers, acids and bases generated by the testing operation will be maintained as separate waste and identified as such. All waste will be stored in hazardous waste satellite accumulation areas that are maintained in accordance to local and state regulations, approved by both Fire Marshall and designated hazardous waste disposal company. The drums will be stored in restricted access areas under video surveillance. Solvent recapture using a UL-certified and explosion proof rotary evaporator or similar is performed in secondary containment inside of a rated hazardous exhaust chemical fume hood per NFPA 30 & 70. All waste will be labeled with components and compositions in accordance with hazardous waste disposal company. All chemical waste containing cannabinoids is maintained below federal concentration limits of 0.3% by weight at all times. In addition, all handling and disposal operations will be performed by two employees per Code of Federal Regulations, Title 21, 1317.95.

All chemicals are stored in flammable safety cabinets designed to meet OSHA and NFPA 1 & 30 standards. Doors are self-latching and can be locked to prevent unauthorized access. Cabinets maintain any leaks/spills, will be properly grounded to prevent static sparking, and clearly labeled for easy identification. All hazardous materials will be disposed of through contracting with a local hazardous waste disposal company.

#### *Onsite Destruction of THC cannabis Waste Materials*

All cannabis waste collected and tracked throughout the work day will be collated at the end of the day.

Waste will be rendered irretrievable as defined in Code of Federal Regulations, Title 21, Part 1300. This will be accomplished by running all cannabis waste through a commercial grade chipper and then blending it with non-hazardous facility waste, such as expended container media, at a 1:1 ratio. Grinding and blending of cannabis waste material will be performed in a monitored area with increased ventilation to minimize dust issues inside the facility. Although cannabis waste is non-hazardous, staff assigned to this duty will be required to wear hearing and eye protection during grinding and offered dust masks for the purposes of

preventing throat and lung irritation. After the waste has been rendered irretrievable, it will be placed in a locked dumpster and held on the premises for routine trash service pickup.

At least two properly trained employees will be on hand to run the chipper and witness the destruction of the cannabis waste materials. The presence of two employees is necessary for compliance with Code of Federal Regulations, Title 21, Part 1317, Subpart C, including §1317.95(d)(1) and (2) which require that all onsite destruction of controlled substances be carried out and observed by at least two employees. Upon completion of the destruction, both employees will be required to sign off on a daily waste material destruction log, which will be held on site for at least two years.

## Collection and Disposal of non-cannabis Waste

### Non-Hazardous Waste Disposal

Non-hazardous refuse or waste products incident to the manufacture, preparation, packing, selling, or dispensing of cannabis (but not including cannabis waste) will be removed from the building at least once every 24 hours, or more often as necessary, to maintain clean, orderly, pest-free, and sanitary conditions. Happy Valley's general policy for non-hazardous waste disposal is as follows:

*Shredder* – As a precaution, any paper, plastic, or foil packs that held cannabis or have been in contact with cannabis must be shredded. Throughout the day, discarded items of this category will be placed in a waste bin, to be shredded at the end of day. In addition, anything containing sensitive information must be shredded.

*Trash Can* – Anything to be discarded that has NOT come in contact with cannabis or is not sensitive in nature (coffee cups, personal trash, label/sticker trash, spent media, etc.) will be collected in trashcan or recycling bins, labeled for general waste (as appropriate).

*Dumpster* – Trash must be moved from the interior of the building and placed in a locked dumpster for municipal trash pickup. Trash must be removed at minimum, once every 24 hours, typically at the end of the work day.

### Hazardous or Controlled Waste Disposal

The production, manufacture, and testing of cannabis, requires the usage of equipment and substances that can result in the generation of hazardous or regulated waste. These include spent light bulbs, chemicals used in laboratory analysis, chemicals used in cultivation and extraction. All non-cannabis containing hazardous waste materials, generated through testing and extraction of cannabis, will be segregated and disposed of, as described above.

Waste generation and will ensure these waste types are disposed of in accordance with applicable State and Federal regulations. Happy Valley will contract with local waste disposal companies to facilitate the compliant disposal of these waste categories. Waste receptacles for these types of waste will be obtained, as needed, from the disposal company and placed in the facility at strategic locations.

All such waste will be held at the facility until picked up for compliant disposal by the contracted waste disposal company.

### Storage of Sanitizing and Disinfecting Chemicals

All potentially toxic sanitation/disinfectant chemicals, along with any other potentially toxic chemicals used in the cultivation, processing, or testing of cannabis and related products, will be stored in cabinets within their respective areas of the facility. These cabinets will conform to the specifications necessitated by the types of chemicals stored and will be labeled to ensure that employees know that potentially hazardous chemicals are stored within. Disposal of used containers and other waste will be carried out per label directions and in accordance with all applicable law.

### Rinsates and Disposal:

Happy Valley has strict pesticide rinsate disposal procedures to ensure chemicals do not end up in municipal drainage and/or water supplies. This includes the use of IPM specific water sources and backflow preventers on all water sources. Happy Valley will also utilize top-of-the-line spill and containment kits. After applications, all sprayers are cleaned and rinsed. The rinsate is then applied to the same specified section as the application so no chemical or mix goes down a drain. Empty pesticide bottles are disposed of by triple rinsing the chemical into the next application. The bottles are then punctured and disposed.

## Happy Valley Pesticide Info for Wastewater Permit

Happy Valley's IPM Department is devoted to the responsible application of pesticide products as part of our pest management plan and will work closely with the MA Department of Agriculture to ensure specific products and their labels are compliant. All pesticide products used by Happy Valley will be certified by the Organic Materials Review Institute (OMRI), and are therefore deemed worthy for organic crop production. The word "organic" in agriculture does not imply pesticide-free production. Organic standards require that pesticides, if used, are derived from natural sources and not synthetically manufactured.

Happy Valley will have strict pesticide rinsate disposal procedures to ensure chemicals do not end up in municipal drainage and/or water supplies. This includes the use of IPM specific water sources and backflow preventers on all water sources. Happy Valley will also utilize top-of-the-line spill and containment kits. After applications, all sprayers are cleaned and rinsed. The rinsate is then applied to the same specified section as the application so no chemical or mix goes down a drain. Empty pesticide bottles are disposed of by triple rinsing the chemical into the next application. The bottles are then punctured and disposed.

The active ingredients Happy Valley will be using can be broken down into two categories:

- FIFRA 25(b) Exempt Products
- EPA Registered Products

### **Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 25(b)**

These products will be used throughout the growing process. Because these products are also exempt from residue tolerance requirements, they are ideal to use in later stage flowering plants where one of the goals is to limit any potential harmful residues that may be left on the plants during harvest. 25(b) products are usually essential oils used to suffocate or repel insects.

- Peppermint oil
- Rosemary oil

### **EPA Registered Pesticides**

The EPA registered products can be broken down into five categories:

- Horticultural Oils
- Horticultural Soaps
- Biological Organisms
- Antimicrobials
- Neurological Pesticides

#### *Horticultural Oils*

Typically, petroleum based oils that have been refined to a clear liquid specifically formulated for use in the horticultural industry. Some of the oils are also derived directly from plants such as the Neem Tree. The mode of action for these active ingredients is to suffocate insects by blocking tubes used by the insect to regulate air exchange. These products can also work as a deterrent as they add a "shine" to the leaves that works to repel insects. Apart from being used as a pesticide, horticultural oils can greatly increase plant health in unideal situations by strengthening the plant's natural cuticle layer. The horticultural oils will be used primarily during vegetative growth and potentially the first two weeks of

flower, before flowers have developed. It is important to limit the use of these products when flowers have formed as they can cause contamination in extracts or the finished product.

- Mineral Oil
- Neem Oil
- Azadirachtin
- Clarified Hydrophobic Extract of Neem Oil

#### *Horticultural Soaps*

The most widely used products in the horticultural industry. They work by desiccating the cuticle layer of the insect thereby drying them out. Horticultural soaps will be used in rotation with horticultural oils in a very similar manner. However, because soaps are known desiccants they can cause damage to plants experiencing low humidity. Therefore, the use will be limited to only vegetative applications.

- Potassium Salts of Fatty Acids

#### *Biological Organisms*

Biological controls are regulated by the EPA and usually dispersed much like a regular pesticide. They work by inoculating sites that could have otherwise been occupied by unwanted microorganisms and fungal organisms such as powdery mildew. These products will only be used during vegetative growth and if required, the first two weeks of flower before floral structures have developed.

- Bacillus Amyloliquefaciens Strain D747
- Bacillus Thuringiensis

#### *Antimicrobials*

Considered oxidizers that work by denaturing or otherwise destroying proteins. These products are widely used by almost all sectors within the agricultural industry. Because oxidizers breakdown relatively quickly they can be used during most stages of growth. This also makes them a more desirable option for control of certain bacteria's and fungal pathogens.

- Peroxyacetic Acid
- Hydrogen Peroxide

#### *Neurological Pesticides*

Work primarily on the sodium gates or channels within living organisms to cause rapid synapse fire, resulting in death. Because the products Happy Valley will use are all OMRI certified, Happy Valley will only use pyrethrins that are naturally derived from the chrysanthemum flower. This active ingredient is not part of a product rotation and is only used on an as needed basis in extreme circumstances. Pyrethrins typically have a very short half-life because of residue concerns, thus they will only be used during vegetative production.

- Pyrethrins

#### *OMRI Certified Pesticides*

Here is a list of OMRI Certified pesticides that may be stored and/or used at Happy Valley:

- Tritex Oil: EPA REG. NO. 48813-1; Active ingredient: 80% mineral oil
- Triact 70: EPA REG. NO 70051-2-59807; Active ingredient: 70% Clarified Hydrophobic Extract of Neem Oil
- M-Pede: EPA REG. NO 10163-324; Active ingredient: 49% Potassium salts of fatty acids
- Azaguard: EPA REG. NO 70299-17; Active ingredient: 3% Azadirachtin

- Double Nickel: EPA REG. NO 70051-108; Active ingredient: 25% Bacillus amyloliquefaciens strain D747
- GC-Mite: 25-b; Active ingredient: 40% Cottonseed Oil, 20% Clove Oil, 10% Garlic Oil
- Ecotec: 25-b; Active ingredient: 10% Rosemary Oil, Peppermint Oil
- Evergreen: EPA REG. NO 1021-2560; Active ingredient: 5% Pyrethrins
- Zerotal 2.0: EPA REG. NO 70299-12; Active ingredient: 27% Hydrogen Dioxide, 2% Peroxyacetic Acid
- Leaf Life Gavicide Green 415: EPA REG. NO 34704-1028; Active ingredient: 98% Mineral Oil

### **Pesticide Safety Training**

All employees who work in or around areas/plants that have been treated with pesticides will be trained and are required to know the rules and procedures for safety; before, during and after application. All cultivation and processing employees are required to read and acknowledge required EPA Certified Training Material. The EPA registers and classifies all pesticides, and establishes Worker Protection Standards (WPS - See WPS 40 CFR 170) requirements for each pesticide. All workers will be trained to understand how to identify areas that have restricted access and the precautions that must be taken if entering that area (i.e. areas that have been treated).

### **Notification of Pesticide Applications and Recordkeeping**

Pesticide applications will be recorded in compliance with WPS requirements and will include:

- Customer/Facility information
- Date
- Time
- End time
- Locations
- Sq. ft. of location
- Application type
- Target pest
- Crop/site
- Pesticide name
- EPA regulation number
- Active ingredient
- Application dilution
- Application amount
- Restricted Entry Intervals (REI)
- REI expiration time and date
- Applicator I.D.

# Happy Valley

## Security Plan and Protocols

Training for all Happy Valley employees will be conducted by a member of the security management team or the Director of Security. The security management team also has direct experience with legally licensed marijuana businesses in other states and will bring their knowledge and training directly to Happy Valley Ventures employees.

The training will specifically address the following:

### FEDERAL AND STATE MEDICAL CANNABIS LAWS AND REGULATIONS

The security management team will instruct all employees on current local, state and federal laws and regulations regarding state legal marijuana. Happy Valley Ventures feels that it is vital for all employees to understand the U.S. Federal Government's position on the enforcement of the Controlled Substances Act (CSA) as it relates to state legal marijuana.

Happy Valley will ensure that all employees fully understand the following:

1. "Typically, when any of the following characteristics is present, the conduct will not be in clear and unambiguous compliance with applicable state law and may indicate illegal drug trafficking activity of potential federal interest:
  - unlawful possession or unlawful use of firearms;
  - violence;
  - sales to minors;
  - financial and marketing activities inconsistent with the terms, conditions, or purposes of state law, including evidence of money laundering activity and/or financial gains or excessive amounts of cash inconsistent with purported compliance with state or local law;
  - amounts of marijuana inconsistent with purported compliance with state or local law;
  - illegal possession or sale of other controlled substances; or
  - ties to other criminal enterprises."
2. "This guidance regarding resource allocation does not "legalize" marijuana or provide a legal defense to a violation of federal law, nor is it intended to create any privileges, benefits, or rights, substantive or procedural, enforceable by any individual, party or witness in any administrative, civil, or criminal matter. Nor does clear and unambiguous compliance with state law or the absence of one or all of the above factors create a legal defense to a violation of the Controlled Substances Act. Rather, this memorandum is intended solely as a guide to the exercise of investigative and prosecutorial discretion."

Happy Valley will train all employees on the laws and regulations of the Commonwealth of Massachusetts regarding Medical and Adult Use Cannabis. More specifically, employees will be made familiar with the laws and regulations set forth in Chapter 369, An Act For The Humanitarian Medical Use of Marijuana and 935 CMR 500, Adult Use of Marijuana.

Once the employees have a clear understanding of all applicable Federal, State and Local laws pertaining to Cannabis and the CSA, Happy Valley feels the employees will better understand the importance of detecting and preventing the diversion of cannabis.

Training sessions will be conducted as part of a new employee's orientation and will include all personnel policies and security procedures. They will also focus specifically on detecting and preventing diversion.

On-going mandatory training sessions will be conducted throughout the year for all employees. This training will be conducted by Happy Valley's Director of Security or Security Management Team. Throughout their employment, all employees will be reminded by company emails and at meetings that the company continually monitors for theft, loss and diversion. We will report incidents of theft or diversion to local law enforcement and will prosecute all involved employees.

To further detect and deter internal theft, a bag check will take place at the beginning and end of each shift, and any time employees enter and leave the premises.

Security management personnel will continuously update and reevaluate the anti-diversion and detection material. Current trends, news related to criminal activity, rules and regulations updates, Federal, State and Local law updates and security protocols will be instructed to all employees.

Employees will also be required to read and sign a Statement of Understanding upon hire. The statement will reinforce the philosophy of Happy Valley as an organization who will not tolerate any criminal activity by employees while on or off duty. The statement will reiterate the severity of any diversion of marijuana outside the regulatory framework designed and implemented by the Commonwealth of Massachusetts. Any employee who violates this statement will be immediately terminated from employment with Happy Valley and will be reported to the appropriate law enforcement agency. Happy Valley employees will also be instructed to cooperate with law enforcement personnel during any investigation, either regulatory or criminal. Any employee who fails to respond to any regulatory agency appropriately will also be immediately terminated from employment.

Happy Valley has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Performance Test for each employee. The Final Performance Tests are comprised of demonstrable, measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test



before being moved out of their probationary employment period. This Final Performance Test will incorporate all aspects of the security procedures. Security procedures will include but will not be limited to proper identification training, proper storage and display of products, cash deposit procedures, records retention and storage, understanding of public and nonpublic areas, proper use of burglary alarms and panic alarms, delivery/receiving of products, and opening and closing procedures. Security procedures will be continuously reevaluated to ensure employees receive the knowledge and resources required.

Employees will receive on-going education on the current video surveillance systems installed, how it operates, how to create backup recordings in the event of a threatening event, or requested by state or local officials. Employees will learn how to determine if the video alarm system is functioning properly with routine tests.

Security and compliance personnel will ensure all managers and employees are properly educated on Commonwealth of Massachusetts rules and regulations regarding video surveillance of Happy Valley facilities. Training will center around the requirement that all video must be continuously recorded 24 hours per day, 365 days per year, without interruption and must cover all areas of the facility where medical cannabis is processed, manufactured or stored and all entrances and exits of the facility. Employees will be instructed to regularly inspect the video surveillance equipment and ensure these requirements are fulfilled. Managers will be required to demonstrate the ability to operate the video surveillance system. Managers will demonstrate their knowledge of the equipment by accessing the required days of video, create still photos and print legible copies of those photos, create recordings with the proper date and time stamp, and to properly store those recordings.

Employees and management will receive instruction on the proper arming and disarming of the perimeter alarm system. Security personnel and the compliance team will train Happy Valley employees in the requirement to maintain the perimeter alarm at all points of ingress and egress and all windows of the facility. Management and employees must demonstrate the ability to operate the alarm and be able to notify the alarm monitoring company of any false alarms or system malfunctions.

Security personnel will also instruct all employees about the proper use of panic alarms and the locations of those alarm devices throughout the facility. Security personnel will continuously quiz management and employees about the locations of the devices and Happy Valley Ventures employees will be required to identify those areas. Security personnel will highlight the purpose of this device is to discreetly notify law enforcement of an emergency situation and should only be used for these incidents. Employees will be instructed to use the panic alarm in an emergency situation where they are unable to use a phone to contact authorities.

The compliance team and security team will train all Happy Valley Ventures employees about the proper way to handle any triggered alarm, either false or valid. The training will include the appropriate steps during a burglary, robbery, or any other emergency situation. Happy Valley Ventures will utilize professionals with law enforcement, fire department and emergency

services experience to give employees and management the knowledge necessary for any situation that an alarm is triggered. Each time an alarm is triggered by an employee, he or she will utilize a log to track the date, time, reason for the alarm, which emergency agency responded and outcome. Happy Valley Ventures will use this information to determine any weaknesses in the alarm training for managers and to ensure all alarms only occur when necessary. All managers and employees will be trained if an alarm is unintentionally activated, immediately notify a supervisor contact the security company. Happy Valley Ventures contracts with ex law enforcement officers who will provide the necessary guidance to positively interact with law enforcement and emergency personnel. All managers and employees will receive training in the proper procedure for handling false or valid alarms, filing reports with State and local authorities, and identifying possible suspicious activity around the licensed facility.

Happy Valley Ventures will utilize security personnel and professionals with a background in law enforcement to create a protocol for receiving visitors into the licensed facility. The training for managers and employees will focus on proper identification training and registered processor agent identification cards. The training will incorporate the awareness to recognize a fraudulent identification card. All facilities will be issued a current "I.D. Checking Guide" ordered from [www.driverslicenseguide.com](http://www.driverslicenseguide.com) and will be required to be know the location of the book in each facility. The book is commonly used by establishments who have to verify age and identity of customers. Managers and employees will also be given an ID scanner and be trained in the functions and uses of the machine provided.

Happy Valley will incorporate a comprehensive guideline for all employees and require all employees to strictly adhere to this. The guideline will include protocols for video recording and retention, alarm use and panic alarm use, perimeter security, interior security procedures and shipping/receiving of cash deposits and medical cannabis. All employees will be required to read and understand each component of the protocols and will be periodically tested by security personnel.

Happy Valley has a comprehensive training curriculum that instructs department managers and employees on safety procedure.

All staff members will be trained on the following basic information:

- Emergency Contact Information will be posted by each phone.
- Business Address and Directions to the facility,
- Location of all Emergency Equipment: Fire extinguishers, First aid kit, eyewash station, chemical spill control material, etc.
- Evacuation Routes- Should have at least two.

The following areas will be specifically addressed during the Safety Training:

#### MEDICAL EMERGENCY

- Managers certified in CPR
- Ensure all employees are aware of any medical conditions of other employees that may require action. (Voluntary information)

- Basic first aid procedures for employees.
- Proper stabilization techniques for a victim and prepare for transport.
- Recognizing common signs to medical emergencies.

#### FIRE

- Detailed knowledge of the fire safety strategy of the premises;
- Awareness of human behavior in fires;
- How to encourage others to use the most appropriate escape route;
- How to search safely and recognize areas that are unsafe to enter.
- The difficulties that some people, particularly if disabled, may have in escaping and any special evacuation arrangements that have been pre-planned.
- Additional training in the use of firefighting equipment;
- An understanding of the purpose of any fixed firefighting equipment such as sprinklers or gas flooding systems; and reporting of faults, incidents and near misses.
- Ensure that the proper National Fire Protection Association (NFPA) Hazardous Material Placards are displayed on the exterior of the building so Emergency Personnel responding are alerted to any hazardous chemicals on-site.

#### CHEMICAL SPILL

- Know where to find the MSDS (Material Data Safety Sheet) for any chemical used in the workplace. These sheets provide valuable information which you will need in case of an accidental chemical exposure or spill.
- Know where (if any) chemicals are stored on-site.
- Ensure that the proper National Fire Protection Association (NFPA) Hazardous Material Placards are displayed on the exterior of the building so Emergency Personnel responding are alerted to any hazardous chemicals on-site.

Employees will be trained in the following categories, with scheduled on-going reviews and updates quarterly with all training records maintained in personnel records.

#### ARMED ROBBERY

- Do not resist the robber. The money is not worth risking your life for
- Do not encourage the use of weapons against the robber
- Try to inform the robber of any surprise other than tripping the silent alarm. If someone is expected back soon or if you must reach or move in any way, tell the robber what to expect so they will not be startled
- Follow the robber's commands, but do not volunteer help
- Try to keep customers and employees calm during the robbery
- Activate the holdup alarm only if it can be done without being obvious to the robber
- Take mental notes of the robber's physical appearance (height, weight, race, sex, hair color, eye color, tattoos, etc.), clothing, voice, etc.
- Keep a minimum of easily accessible cash on hand, both in the cash drawer and in the safe
- Do not open the safe too often
- Employees should not count large amounts of cash in areas visible to the public

Preparedness for a post-robbery situation can place the employee in a better position to provide information to police that will assist in capturing the robber and protecting employees and customers from harm

- Do not allow the robber to take you to another location, remain at the facility
- Do not chase or follow the robber
- Secure the doors so the robber cannot re-enter the business. Don't let anyone in except for emergency personnel
- Call the police immediately
- Care for injured people
- Try to note the robber's method of escape and direction of travel
- Preserve any potential evidence
- Ask Witnesses to remain until the police arrive

#### INVASION

- Be aware of your surroundings
- Look for patterns, suspicious behavior
- Remain calm and realize the event that is taking place
- Press panic alarm to notify authorities
- Relay predetermined code word to employees
- Do not resist, protect yourself and those around you.
- Take mental notes to provide detailed descriptions to arriving police officers

#### BURGLARY

- Develop opening and closing procedures. Have at least two employees present during opening and closing time. When opening, inspect the business for forcible entry before entering the business. One employee should search the premises before admitting others.
- Teach employees to look for any signs of forced entry when arriving at the licensed premises.
- Detailed procedures to follow if a break in is discovered.
- Procedures to count money in a place that is not visible to patients/customers, in a location in the operation zone.
- Procedures to report unusual questions by anyone (amount of money in the store, amount of products in the store, who opens and closes, where employees live, routes of product transports, location of grow facilities, location of surveillance cameras.)
- Keep security camera views available for employees only. Do not allow customers/contractors to see the views (unless required, i.e. Security Company)
- Be sure there is no one inside the building prior to closing for the day

#### ANY CRIMINAL INCIDENT

- Notify police immediately.
- Take care of any injured persons and notify emergency medical services if applicable
- Try to write down any information that will assist law enforcement.
- Do not touch or move anything that was involved in the incident.

- Happy Valley will train employees in a three-tiered process. This process is based upon the most recent studies on memory retention and learning skills. Happy Valley will create an informative and educational visual presentation that will address all the necessary information employees will need to recall. The second mode will be an online, learn at your pace, presentation that allows employees to learn while working on the computer as the newer generations have become accustomed. The third mode will involve learning while on the job. This will allow us to train employees during real time and simulate events for the employees to react to a predetermined medical emergency.

Happy Valley will utilize Crime Prevention Through Environmental Design (CPTED) to implement a multi-disciplinary approach to deter criminal activity through environmental design. We will ensure that trees, bushes, and other foliage outside of the dispensary premises does not allow for a person or persons to conceal themselves from sight. Happy Valley Ventures will utilize a single secure entrance for patient access. The entrance will have a mechanical lock and interior electronic locks to ensure that access to the building is monitored by on-site security as well as electronically. Additional points of ingress and egress will have industrial grade locks installed as well as video surveillance and motion detectors. Windows will be tinted so not to allow easy vision of the interior. In addition, a locked door or other barrier will be installed between the dispensary entrance and the limited access area. Our security system will provide intrusion detection, detection of smoke or fire and power loss to the building, perimeter and critical storage areas. The system includes these components: 1) Door Contact Switches; 2) Request to Exit Signals; 3) Bond Sensors; 4) Passive Infrared Sensor; 5) Glass Break Detector; 6) Panic Alarms; 7) Smoke/Fire Alarms. As part of the vault security system, we will utilize a TL-30 UL-rated vault door, video monitoring, door contacts, motion detectors, and duress buttons. Intrusion detection devices will be placed at all exterior doors and windows, roof entry points, security rooms, and the vault. The system monitors all sensors on a 24/7 basis. A central monitoring station will receive notification of all alarms.

Happy Valley will construct vaults and secure inventory rooms that are constructed of UL Listed Class I masonry walls and located in the interior of the facility with only one commercial grade TL-30 UL rated vault entrance door that is out of public view. The door will be equipped with HID ICLASS readers as access control card readers and biometric readers. This is a top of the line reader designed to enhance security and is user friendly. The access system allows management to maintain a full audit trail of everyone who enters or leaves any secure area of the dispensary.

Happy Valley has written our Standard Operating Procedures to ensure that all cannabis products will be safely and properly stored and locked in the secure inventory room at all times other than when product is being prepared for transport.

Happy Valley will use commercial grade security lighting that will ensure the ability to see and identify any persons 24 hours a day and facilitate surveillance. The lighting shall be installed in such a manner to completely illuminate the facilities interior, perimeter and parking areas.

Happy Valley security system will provide intrusion detection, detection of smoke or fire and power loss to the building, perimeter and critical storage areas. The system includes these components: 1) Door Contact Switches; 2) Request to Exit Signals; 3) Bond Sensors; 4) Passive Infrared Sensor; 5) Glass Break Detector; 6) Panic Alarms; 7) Smoke/Fire Alarms. As part of the vault security system, we will utilize a TL-30 UL-rated vault door, video monitoring, door contacts, motion detectors, and duress buttons. Intrusion detection devices will be placed at all exterior doors and windows, roof entry points, security rooms, and the vault. We will have panic devices located conveniently and readily accessible throughout the facility. The system monitors all sensors on a 24/7 basis. A central monitoring station will receive notification of all alarms. This system shall remain operational until the facility no longer has medical cannabis on premise. The system will also be equipped with sufficient auxiliary power to maintain operation for 48 hours.

The system is designed to be monitored and controlled by computer and recorded on a digital recording device. In addition, the central monitoring station monitors all alarms 24/7; if alerted to a possible intrusion, the monitoring station will verify the presence of an unauthorized intruder and alert local law enforcement immediately. The electronic monitoring system to be used includes a failure notification system that provides both an audio and visual notification should a failure in the surveillance system occur. The failure notification system will send an alert to designated employees.

Happy Valley's intrusion detection system will also provide detection of smoke or fire to the building, perimeter, secure room and critical storage areas through use of commercial smoke and fire alarms. If alerted to a possible fire, the monitoring station will attempt to verify the presence of a fire and alert the local Fire Department immediately.

The electronic monitoring system to be used includes a failure notification system that provides both an audio and visual notification should a failure in the surveillance system occur. The failure notification system will provide an alert to designated dispensing organization agents within five minutes after the failure, either by telephone, email or text message.

Happy Valley will install several panic buttons for staff use in strategic, convenient and readily-accessible locations throughout the dispensary, including all Security Keypads, Point of Sale Systems, Security Room, Critical Storage Areas, Vault, Reception Area and Offices. The panic alarm will directly or indirectly notify, by the most efficient means, the Public Safety Answering Point (PSAP) for the law enforcement agency having primary jurisdiction. All employees will be trained on the proper time to use and where they are located. Security personnel will also instruct employees on the procedures to follow in case of an accidental activation.

Happy Valley security system monitors all sensors on a 24/7 basis. A central monitoring station will receive notification of all alarms or power failures. The electronic monitoring system to be used includes a failure notification system that provides both an audio and visual notification

should a failure in the security system occur. In the event of a power failure, the system will be equipped with sufficient auxiliary power to maintain operation for 48 hours.

Happy Valley will install and maintain a motion activated, high definition digital video surveillance system that records all activity in images of high quality and high resolution capable of clearly revealing facial detail. Video cameras will be angled so as to allow for the capture of clear and certain identification of any person entering or exiting the facility. Cameras shall be installed, at a height sufficient to prevent tampering, in protective housing, with conduit to protect cabling into and out of the cameras.

Happy Valley will post signage to delineate between the public waiting areas and the dispensary area. Happy Valley will also post business hours on the entrance door to the public zone. All doors and windows will be secured between the public zone and operations zone with an electronic key access point that will create an electronic log as well as a tamper evident log book documenting movement to and from the operations zone. Happy Valley shall use alarm and video surveillance equipment as well as on-site security to monitor and control movement between these two zones.

1. Happy Valley will maintain a public waiting area that will be clearly marked by signage and hours of operation. The public waiting area will be separated from the service area by a secured door. Agents will check all required paperwork prior to allowing a qualifying patient or caregiver into the operations zone. The public waiting area will not have any items containing medical cannabis visible to the general public.
2. At Happy Valley retail locations we will provide a service area where Agents may consult with qualifying patients and caregivers, as well as dispense medical cannabis. The service area will be separated from the public zone and operations zone by secured doors and marked by signage to each zone. The service area will have appropriate displays or non-medicated examples to prevent any handling of medical cannabis until dispensed by the Dispensary Agent.

Happy Valley will initially, conspicuously post signage that will delineate the area of the dispensary and detail those persons allowed access to the dispensary area. Happy Valley will maintain locked and secured doors and windows between the waiting area and dispensary. An electronic key access shall be utilized and will create an electronic log that will document all movement to and from the dispensary. In addition, Happy Valley will utilize an alarm and surveillance system as well as on-site security to monitor and control activities in and around the restricted area of the operations zone.

Happy Valley will utilize cutting edge technology to provide a secure access point between public zones and operation zones. The door will be equipped with HID ICLASS readers as access control card readers and biometric readers. This is a top of the line reader designed to enhance security and is user friendly. The access system allows management to maintain a full audit trail of everyone who enters or leaves all zones located in the dispensary. At all times these doors will remain locked and policy and procedures implemented to not allow this access point

to be propped open at any time. The electronic key access allows Happy Valley the ability to restrict movement from zone to zone and with the addition of the tamper proof log, will have complete records both electronically and physically of all movement between zones.

Happy Valley will employ both the alarm system and video surveillance to assist with monitoring access to and from the operation zone and maintain control of public zone. Happy Valley will be utilizing an electronic key access point to the operations area which will be tied into the alarm and video surveillance system. Constant visual surveillance and electronic alarms will allow security personnel to monitor who is entering or leaving the operations zone. Surveillance cameras and alarm system will be engaged once someone enters the public zone. This will allow security personnel to track the movement of each individual throughout the licensed premises. Happy Valley shall post adequate signage alerting patrons that video surveillance is being utilized and signage delineating the public zone from the operations zone. Happy Valley will also employ on-site security who will monitor and control movement between zones.

All medical cannabis will be stored in a secured vault or safe that will be secured to the structure of the building in any instance that the cannabis is not being displayed, processed or dispensed during business hours. Any safe used will be in a designated safe room and will not be visible to the public. All secured rooms for storing medical cannabis will require an electronic key or code to enter and will be specifically used for storage of medical cannabis.

Registered dispensary agents will be trained by management staff in the proper methods for admitting visitors into the non-public area of the premises of the Licensee. The dispensary agent will verify the age and identity of the visitor by using a government issued, picture identification and making a legible copy for records. The dispensary agent will complete the visitor log with the date, time in and time out, reason for the visit and the escorting dispensary agent's name.

Agents will verify the identity of visitors by using a government-issued, picture identification. The agent will make a clear and recognizable photocopy of the identification for each visitor during each visit. The agent will attach the copies of the identifications to the visitor log by date and have the log available at all times

Agents will meet with all visitors prior to entering the non-public areas of a facility. The assigned agent will ensure the proper information has been gathered and logged prior to entry. The agent will distribute visitor badges to each visitor and ensure that the badge is worn on the exterior of their clothing and visible at all times while in the non-public areas. An agent will not escort more than a maximum of 3 visitors at once. The agent will remain with the visitors at all times and will not allow the visitors to separate while in non-public areas.

Agents will not escort more than a maximum of 3 visitors at a time so they can maintain proper supervision. A clear set of instructions will be given to the visitors regarding the rules of the facility prior to entering a non-public area. The visitors will be instructed that they will not be



allowed to touch any item containing medical cannabis at any time and will be immediately removed from the property if the rules are not strictly adhered to. An incident report will be generated for any violation.

Happy Valley will create and maintain a visitor log which will be available for inspection. The log will consist of the name, date, time in and time out, reason for the visit and escorting dispensary agent name. The log will be kept in a file or binder and will be readily available before entering any non-public areas. The visitor log and the copy of the visitor's government issued identification will be maintained on site in a hard file and electronically for a minimum of 2 years.

Happy Valley will make deliveries to other licensed Marijuana facilities as well as consumers at home. Members of the security team and the compliance team will educate employees on the rules and regulations created by the Commonwealth of Massachusetts as well as

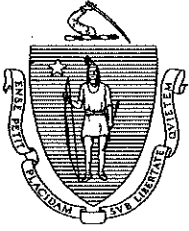
1. Complete a trip plan on appropriate transport manifests
2. Name of Agent in charge of transportation and assisting agent
3. Date and Start time of the trip
4. Description of the MJ products being transported
5. Anticipated route of travel
6. Copy of trip plan to receiving destination
7. Maintain copies of transportation manifests for inspection by the appropriate

The above listed requirements will certainly keep Happy Valley in compliance with all existing State and Local Regulations. The safety of Happy Valley employees and the successful delivery of highly valued inventory are the primary concerns in any marijuana transportation plan.

While taking the state's minimum requirements into account along with the identified risk factors, look at the following suggestions put together by the partners of ACM using our vast law enforcement and tactical experience to develop a much more robust and secure transportation plan:

- Use a transport vehicle without any identifying marks, logos, bumper stickers, vanity plates, etc. at any time. All employees and security personnel should not wear any clothing identifying the company they are employed by or clothing that draws attention to their activities.
- Ensure proper personnel are aware of the estimated departure and arrival times of deliveries. Notify the same personnel of any unexpected delays and update the new estimated time of arrival.
- Do not make any other stops between the licensed facilities. Ensure the delivery vehicle is properly fueled and in proper working order prior to departure.
- Vary routes and order of deliveries between licensed facilities. Do not take the same route on consecutive delivery days.
- Complete detailed background investigations of all delivery and security personnel, prior to employing.

- Limit the total amount of marijuana being transported to a specific number
- Always use at least two employees during transports
- Keep all product in tamper evident shipping containers and never leave any product unattended by at least one of the transporters
- Ensure all product is in a locked container that cannot be removed from the vehicle
- Ensure all product is packaged and labeled properly prior to transport
- Each transporting employee will carry a cellular phone during all deliveries and will be able to contact the originating facility, destination facility and appropriate law enforcement agencies if needed
- All product will be inventoried and weighed on camera prior to the transport beginning to ensure accuracy. All product will again be inventoried and weighed upon arrival and a signature will be required for receiving
- Utilize GPS tracking devices which are monitored through the existing in-house DVD system.
- Transporting agents will keep in regular communication with the originating facility and will report to the facility after every delivery
- Happy Valley will verify that all transporting agents have a valid Massachusetts driver's license, current Massachusetts vehicle registration and current vehicle insurance
- If delivering to a qualifying patient at home, transporting agents will first verify the identity and validity of the patient and his or her Medical Marijuana Program ID card, prior to delivery. Each patient will sign a receipt for the medical marijuana after each delivery.
- If delivering to an adult use consumer at home, transporting agents will first verify the identity and validity of the age on the ID card, prior to delivery. Each consumer will sign a receipt for the marijuana after each delivery.



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
**Medical Use of Marijuana Program**  
99 Chauncy Street, 11<sup>th</sup> Floor, Boston, MA 02111

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Secretary

MONICA BHAREL, MD, MPH  
Commissioner

Tel: 617-660-5370  
[www.mass.gov/medicalmarijuana](http://www.mass.gov/medicalmarijuana)

March 28, 2018

BY U.S. MAIL AND E-MAIL

Mr. Michael D. Reardon  
Happy Valley Ventures MA, Inc.  
39 Country Club Way  
Ipswich, MA 01938

Re: Approval to Change the Name of a Registered Marijuana Dispensary

Dear Mr. Reardon,

Please be advised that Happy Valley Ventures MA, Inc. has been approved to change its name from Happy Valley Ventures MA, Inc. to HVV Massachusetts, Inc.

The Department will continue to verify all information provided by the Registered Marijuana Dispensary ("RMD"), and that the RMD is compliant with applicable Massachusetts law and regulations.

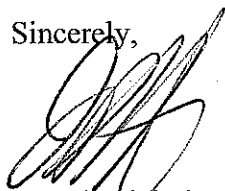
As stated in the Change of Name Application, within 30 days of the date of this approval, the Registrant must submit to the Program evidence that it has filed the appropriate documentation with the Massachusetts Secretary of the Commonwealth Corporations Division to reflect the change of name.

Mail or hand-deliver this documentation to:

Department of Public Health  
Medical Use of Marijuana Program  
RMD Change of Name  
99 Chauncy Street, 11<sup>th</sup> Floor  
Boston, MA 02111

Should you have any questions, please contact the Department at 617-660-5370 or [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Nicholson', written over the word 'Sincerely,'.

Joseph Nicholson, Director of Compliance and Investigations  
Medical Use of Marijuana Program  
Bureau of Health Care Safety and Quality  
Massachusetts Department of Public Health



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
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[www.mass.gov/medicalmarijuana](http://www.mass.gov/medicalmarijuana)

November 3, 2016

BY U.S. MAIL AND E-MAIL

Mr. Michael D. Reardon  
Happy Valley Ventures MA, Inc.  
1150 Walnut Street  
Newton, MA 02461

Re: Provisional Certificate of Registration for a Registered Marijuana Dispensary for a Dispensary, Cultivation and Processing Facility in Gloucester

Dear Mr. Reardon:

Please be advised that you have been selected to receive a Registered Marijuana Dispensary ("RMD") Provisional Certificate of Registration at your proposed co-located Gloucester facility and to move forward to the Inspectional Phase. The issuance of this RMD Provisional Certificate of Registration is subject to the following ongoing conditions:

1. All dispensary agents and capital contributors shall be subject to a background check as set forth in the *Guidance for Registered Marijuana Dispensaries Regarding Background Checks* prior to commencing work as a dispensary agent or contributing funds to the RMD.
2. The RMD shall comply with the Humanitarian Medical Use of Marijuana Act, Ch. 369 of the Acts of 2012 (the "Act"), as implemented by Department of Public Health (the "Department") Regulations, 105 CMR 725.000, et seq. ("Regulations"), during the period of its provisional registration, except as expressly waived in writing by the Department pursuant to 105 CMR 725.700.
3. The RMD shall be subject to inspection and audit to ascertain compliance with any applicable law or regulation, including laws and regulations of the Commonwealth relating to taxes, child support, workers compensation, and professional and commercial insurance coverage.
4. The RMD shall be subject to inspection and audit to ascertain that the RMD is operating at all times in a manner not detrimental to public safety, health, or welfare.

5. The RMD shall be subject to inspection and audit to ascertain that its facilities are compliant with all applicable state and local codes, bylaws, ordinances and regulations.
6. The RMD shall be subject to inspection and audit to ascertain that it has sufficient financial resources to meet the requirements of the Act or 105 CMR 725.000, et seq.
7. The RMD shall cooperate with and provide information to Department inspectors, agents and employees upon request.
8. The RMD shall, as necessary, amend its bylaws to expressly require compliance with 725.100(A)(1) and the "*Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance*" by stating that the RMD shall "at all times operate on a non-profit basis for the benefit of registered qualifying patients" and shall "ensure that revenue of the RMD is used solely in furtherance of its nonprofit purpose." If the bylaws do not expressly include such requirement, they shall be amended within thirty days of the date of this letter and the amended bylaws shall be filed with the Department by mail at the above address and by email at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).
9. The RMD shall keep current all information required by 105 CMR 725.000, et seq., or as otherwise required by the Department pursuant to 725.100(F)(4) and may not make certain changes without prior approval from the Department pursuant to 725.100(F)(1)-(3).
10. The RMD must submit payment of the registration fee required pursuant to 105 CMR 725.100(C)(1) and 801 CMR 4.02.

In the Inspections Phase, the Department will continue to verify, among other things, that the RMD will operate in compliance with the RMD operational requirements, see 105 CMR 725.105 (A)-(Q), and security requirements, see 105 CMR 725.110(A)-(F). Furthermore, the Department may impose other conditions that the Department determines necessary to ensure the RMD will operate in accordance with applicable Massachusetts laws and regulations.

Please be advised pursuant to 105 CMR 725.100(C)(1) the Department may issue a Final Certificate of Registration only after an applicant has successfully completed the Inspections Phase and the Department has issued final approval.

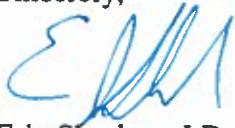
**Please mail the enclosed remittance form with a bank/cashier's check in the amount of \$50,000 payable to the Commonwealth of Massachusetts within thirty (30) days of the date of this letter to:**

Department of Public Health  
Medical Use of Marijuana Program  
RMD Registration  
99 Chauncy Street, 11<sup>th</sup> Floor  
Boston, MA 02111

After the registration fee is processed, this letter shall serve as your Provisional Certificate of Registration with the aforementioned conditions. The Department will continue to verify all information provided by you, and that you are compliant with applicable Massachusetts law and regulations. It is within the Department's discretion to revoke this Provisional Certificate of Registration at any time.

Should you have any questions, please contact the Department at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).

Sincerely,



Eric Sheehan, J.D.  
Bureau Director  
Bureau of Health Care Safety and Quality  
Massachusetts Department of Public Health



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
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November 3, 2016

BY U.S. MAIL AND E-MAIL

Mr. Michael D. Reardon  
Happy Valley Ventures MA, Inc.  
1150 Walnut Street  
Newton, MA 02461

Re: Provisional Certificate of Registration for a Registered Marijuana Dispensary for a Dispensary in Amherst and a Cultivation and Processing Facility in Gloucester

Dear Mr. Reardon:

Please be advised that you have been selected to receive a Registered Marijuana Dispensary ("RMD") Provisional Certificate of Registration at your proposed Amherst retail dispensary and Gloucester cultivation and processing facility and to move forward to the Inspectional Phase. The issuance of this RMD Provisional Certificate of Registration is subject to the following ongoing conditions:

1. All dispensary agents and capital contributors shall be subject to a background check as set forth in the *Guidance for Registered Marijuana Dispensaries Regarding Background Checks* prior to commencing work as a dispensary agent or contributing funds to the RMD.
2. The RMD shall comply with the Humanitarian Medical Use of Marijuana Act, Ch. 369 of the Acts of 2012 (the "Act"), as implemented by Department of Public Health (the "Department") Regulations, 105 CMR 725.000, et seq. ("Regulations"), during the period of its provisional registration, except as expressly waived in writing by the Department pursuant to 105 CMR 725.700.
3. The RMD shall be subject to inspection and audit to ascertain compliance with any applicable law or regulation, including laws and regulations of the Commonwealth relating to taxes, child support, workers compensation, and professional and commercial insurance coverage.
4. The RMD shall be subject to inspection and audit to ascertain that the RMD is operating at all times in a manner not detrimental to public safety, health, or welfare.



5. The RMD shall be subject to inspection and audit to ascertain that its facilities are compliant with all applicable state and local codes, bylaws, ordinances and regulations.
6. The RMD shall be subject to inspection and audit to ascertain that it has sufficient financial resources to meet the requirements of the Act or 105 CMR 725.000, et seq.
7. The RMD shall cooperate with and provide information to Department inspectors, agents and employees upon request.
8. The RMD shall, as necessary, amend its bylaws to expressly require compliance with 725.100(A)(1) and the "*Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance*" by stating that the RMD shall "at all times operate on a non-profit basis for the benefit of registered qualifying patients" and shall "ensure that revenue of the RMD is used solely in furtherance of its nonprofit purpose." If the bylaws do not expressly include such requirement, they shall be amended within thirty days of the date of this letter and the amended bylaws shall be filed with the Department by mail at the above address and by email at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).
9. The RMD shall keep current all information required by 105 CMR 725.000, et seq., or as otherwise required by the Department pursuant to 725.100(F)(4) and may not make certain changes without prior approval from the Department pursuant to 725.100(F)(1)-(3).
10. The RMD must submit payment of the registration fee required pursuant to 105 CMR 725.100(C)(1) and 801 CMR 4.02.

In the Inspections Phase, the Department will continue to verify, among other things, that the RMD will operate in compliance with the RMD operational requirements, see 105 CMR 725.105 (A)-(Q), and security requirements, see 105 CMR 725.110(A)-(F). Furthermore, the Department may impose other conditions that the Department determines necessary to ensure the RMD will operate in accordance with applicable Massachusetts laws and regulations.

Please be advised pursuant to 105 CMR 725.100(C)(1) the Department may issue a Final Certificate of Registration only after an applicant has successfully completed the Inspections Phase and the Department has issued final approval.

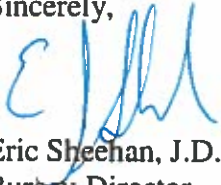
**Please mail the enclosed remittance form with a bank/cashier's check in the amount of \$50,000 payable to the Commonwealth of Massachusetts within thirty (30) days of the date of this letter to:**

Department of Public Health  
Medical Use of Marijuana Program  
RMD Registration  
99 Chauncy Street, 11<sup>th</sup> Floor  
Boston, MA 02111

After the registration fee is processed, this letter shall serve as your Provisional Certificate of Registration with the aforementioned conditions. The Department will continue to verify all information provided by you, and that you are compliant with applicable Massachusetts law and regulations. It is within the Department's discretion to revoke this Provisional Certificate of Registration at any time.

Should you have any questions, please contact the Department at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).

Sincerely,



Eric Sheehan, J.D.  
Bureau Director  
Bureau of Health Care Safety and Quality  
Massachusetts Department of Public Health



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
Bureau of Health Care Safety and Quality  
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November 18, 2016

BY U.S. MAIL AND E-MAIL

Mr. Michael D. Reardon  
Happy Valley Ventures MA, Inc.  
1150 Walnut Street  
Newton, MA 02461

Re: Provisional Certificate of Registration for a Registered Marijuana Dispensary for a Dispensary in Boston and a Cultivation and Processing Facility in Gloucester

Dear Mr. Reardon:

Please be advised that you have been selected to receive a Registered Marijuana Dispensary ("RMD") Provisional Certificate of Registration at your proposed Boston retail dispensary and Gloucester cultivation and processing facility and to move forward to the Inspectional Phase. The issuance of this RMD Provisional Certificate of Registration is subject to the following ongoing conditions:

1. All dispensary agents and capital contributors shall be subject to a background check as set forth in the *Guidance for Registered Marijuana Dispensaries Regarding Background Checks* prior to commencing work as a dispensary agent or contributing funds to the RMD.
2. The RMD shall comply with the Humanitarian Medical Use of Marijuana Act, Ch. 369 of the Acts of 2012 (the "Act"), as implemented by Department of Public Health (the "Department") Regulations, 105 CMR 725.000, et seq. ("Regulations"), during the period of its provisional registration, except as expressly waived in writing by the Department pursuant to 105 CMR 725.700.
3. The RMD shall be subject to inspection and audit to ascertain compliance with any applicable law or regulation, including laws and regulations of the Commonwealth relating to taxes, child support, workers compensation, and professional and commercial insurance coverage.
4. The RMD shall be subject to inspection and audit to ascertain that the RMD is operating at all times in a manner not detrimental to public safety, health, or welfare.

5. The RMD shall be subject to inspection and audit to ascertain that its facilities are compliant with all applicable state and local codes, bylaws, ordinances and regulations.
6. The RMD shall be subject to inspection and audit to ascertain that it has sufficient financial resources to meet the requirements of the Act or 105 CMR 725.000, et seq.
7. The RMD shall cooperate with and provide information to Department inspectors, agents and employees upon request.
8. The RMD shall, as necessary, amend its bylaws to expressly require compliance with 725.100(A)(1) and the “*Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance*” by stating that the RMD shall “at all times operate on a non-profit basis for the benefit of registered qualifying patients” and shall “ensure that revenue of the RMD is used solely in furtherance of its nonprofit purpose.” If the bylaws do not expressly include such requirement, they shall be amended within thirty days of the date of this letter and the amended bylaws shall be filed with the Department by mail at the above address and by email at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).
9. The RMD shall keep current all information required by 105 CMR 725.000, et seq., or as otherwise required by the Department pursuant to 725.100(F)(4) and may not make certain changes without prior approval from the Department pursuant to 725.100(F)(1)-(3).
10. The RMD must submit payment of the registration fee required pursuant to 105 CMR 725.100(C)(1) and 801 CMR 4.02.

In the Inspections Phase, the Department will continue to verify, among other things, that the RMD will operate in compliance with the RMD operational requirements, see 105 CMR 725.105 (A)-(Q), and security requirements, see 105 CMR 725.110(A)-(F). Furthermore, the Department may impose other conditions that the Department determines necessary to ensure the RMD will operate in accordance with applicable Massachusetts laws and regulations.

Please be advised pursuant to 105 CMR 725.100(C)(1) the Department may issue a Final Certificate of Registration only after an applicant has successfully completed the Inspections Phase and the Department has issued final approval.

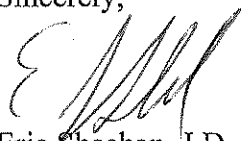
**Please mail the enclosed remittance form with a bank/cashier’s check in the amount of \$50,000 payable to the Commonwealth of Massachusetts within thirty (30) days of the date of this letter to:**

Department of Public Health  
Medical Use of Marijuana Program  
RMD Registration  
99 Chauncy Street, 11<sup>th</sup> Floor  
Boston, MA 02111

After the registration fee is processed, this letter shall serve as your Provisional Certificate of Registration with the aforementioned conditions. The Department will continue to verify all information provided by you, and that you are compliant with applicable Massachusetts law and regulations. It is within the Department's discretion to revoke this Provisional Certificate of Registration at any time.

Should you have any questions, please contact the Department at [RMDcompliance@state.ma.us](mailto:RMDcompliance@state.ma.us).

Sincerely,

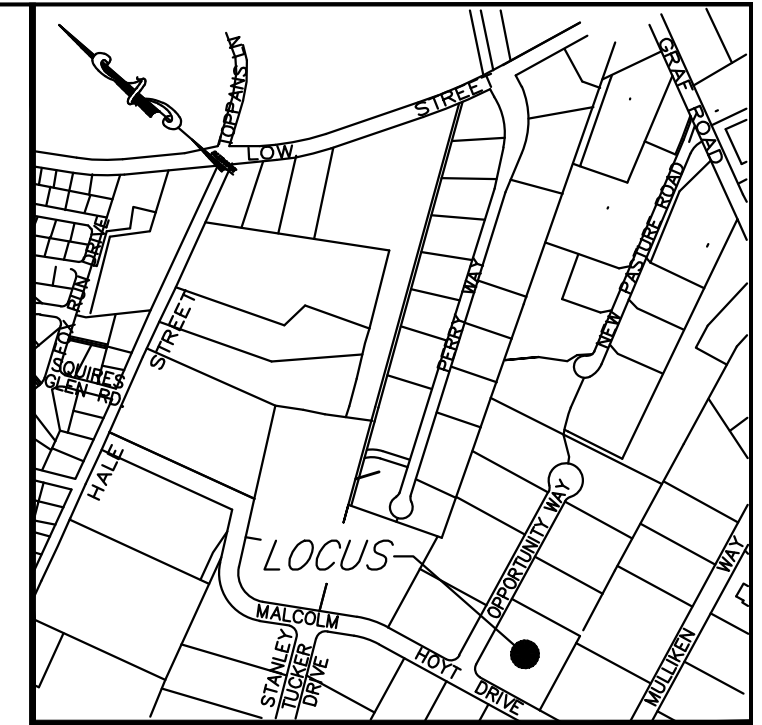
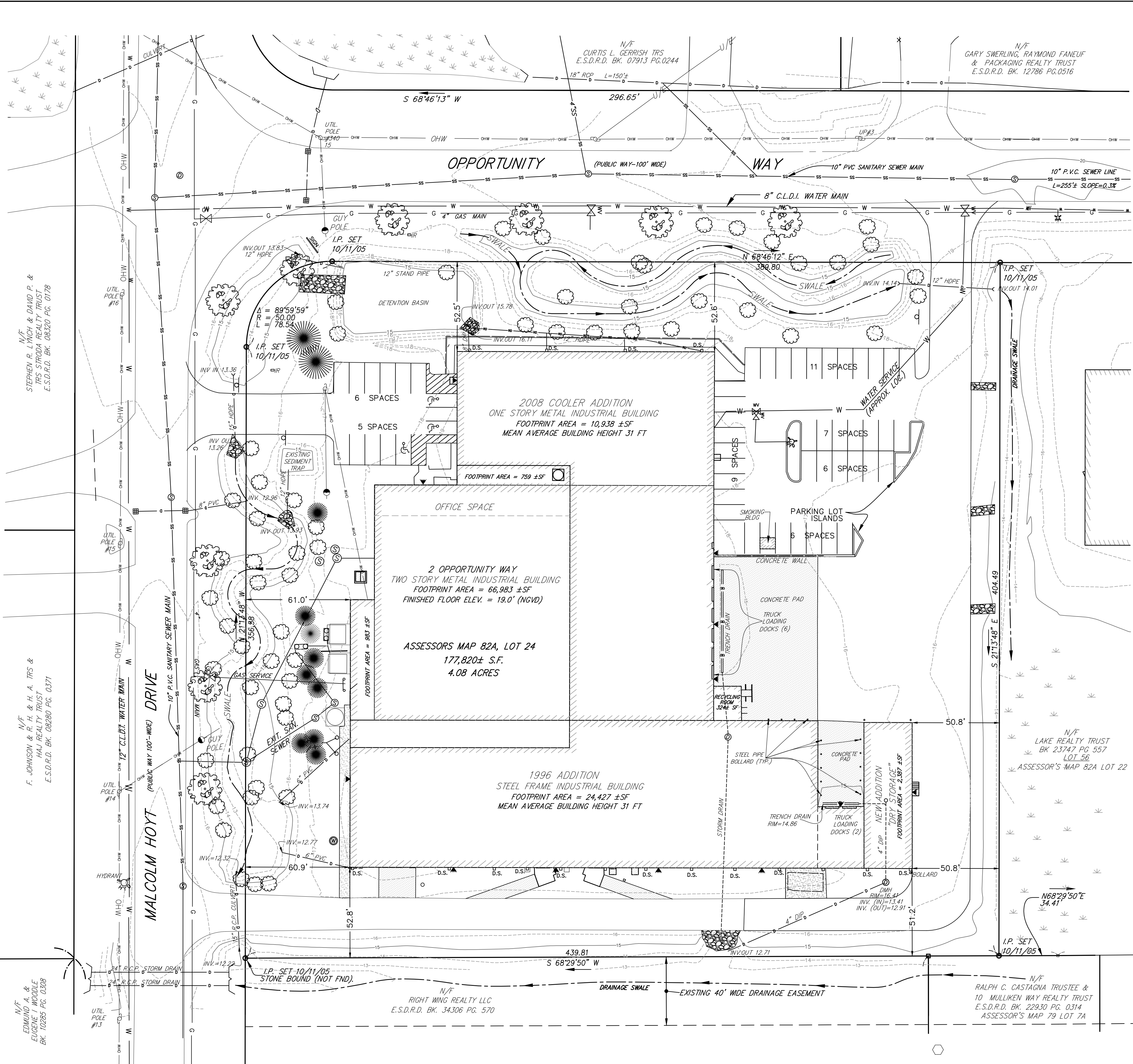
A handwritten signature in black ink, appearing to read 'E. Sheehan', written over a horizontal line.

Eric Sheehan, J.D.

Bureau Director

Bureau of Health Care Safety and Quality

Massachusetts Department of Public Health



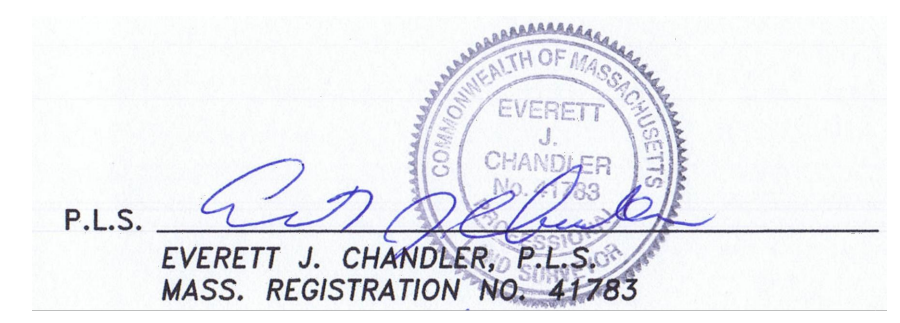
LOCUS MAP  
(NOT TO SCALE)

**NOTES**

THE PURPOSE OF THIS PLAN IS TO SHOW THE EXISTING CONDITIONS ON THE LOT. DETAIL SHOWN IS THE RESULT AN INSTRUMENT SURVEY PERFORMED JUNE 9, 2017.

OWNERSHIP INFORMATION USED IN THE PREPARATION OF THIS PLAN WAS OBTAINED FROM THE CITY OF NEWBURYPORT ASSESSOR'S OFFICES.

TO THE BEST OF MY PROFESSIONAL KNOWLEDGE, INFORMATION, AND BELIEF, THIS PLAN CONFORMS TO THE TECHNICAL AND PROCEDURAL STANDARDS FOR THE PRACTICE OF LAND SURVEYING IN THE COMMONWEALTH OF MASSACHUSETTS.



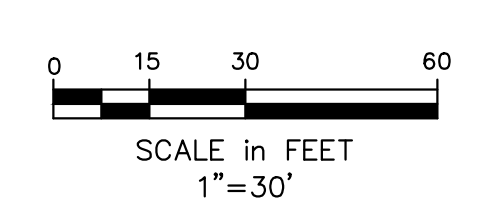
	REQUIRED*	EXISTING
MIN LOT AREA	50,000 SQUARE FEET	177,820 SQUARE FEET
MINIMUM FRONTAGE	60 FEET	824.92 FEET
FRONT SETBACK	50 FEET	52.5 FEET
SIDE SETBACK (R)	50 FEET	50.8 FEET
SIDE SETBACK (L)	50 FEET	60.9 FEET
REAR	50 FEET	51.2 FEET
% LOT COVERAGE	50%	37.7%
MAX BLD HEIGHT	40 FEET	31'
PARKING	32**	50

\*USE 802 DOES NOT HAVE DIMENSIONAL CONTROLS IN SECTION VI. THE CONTROLS SHOWN ARE FOR USE 217.

\*\*0.75 PER EMPLOYEE PER SHIFT PLUS 1 PER COMPANY VEHICLE.

ON-LINE ZONING ORDINANCES  
CITY OF NEWBURYPORT WEBSITE  
<http://www.cityofnewburyport.com/Planning/Index.html>  
PLANNING DEPARTMENT - MAIN PHONE 978-465-4400

INFORMATION REGARDING ZONING, INCLUDING PARKING ABOVE, SHOWN HEREON IS NOT INTENDED TO BE A DEFINITIVE ZONING OPINION AND IS FOR INFORMATIONAL PURPOSES ONLY. ALL INFORMATION SHOULD BE VERIFIED BY LEGAL COUNSEL PRIOR TO RELIANCE UPON THE SAME.



Winter GEC, LLC  
34 WINTER STREET  
NEWBURYPORT, MA 01950  
978-270-8626

SCALE:  
HORIZ: 1" = 30'  
VERT: N.A.

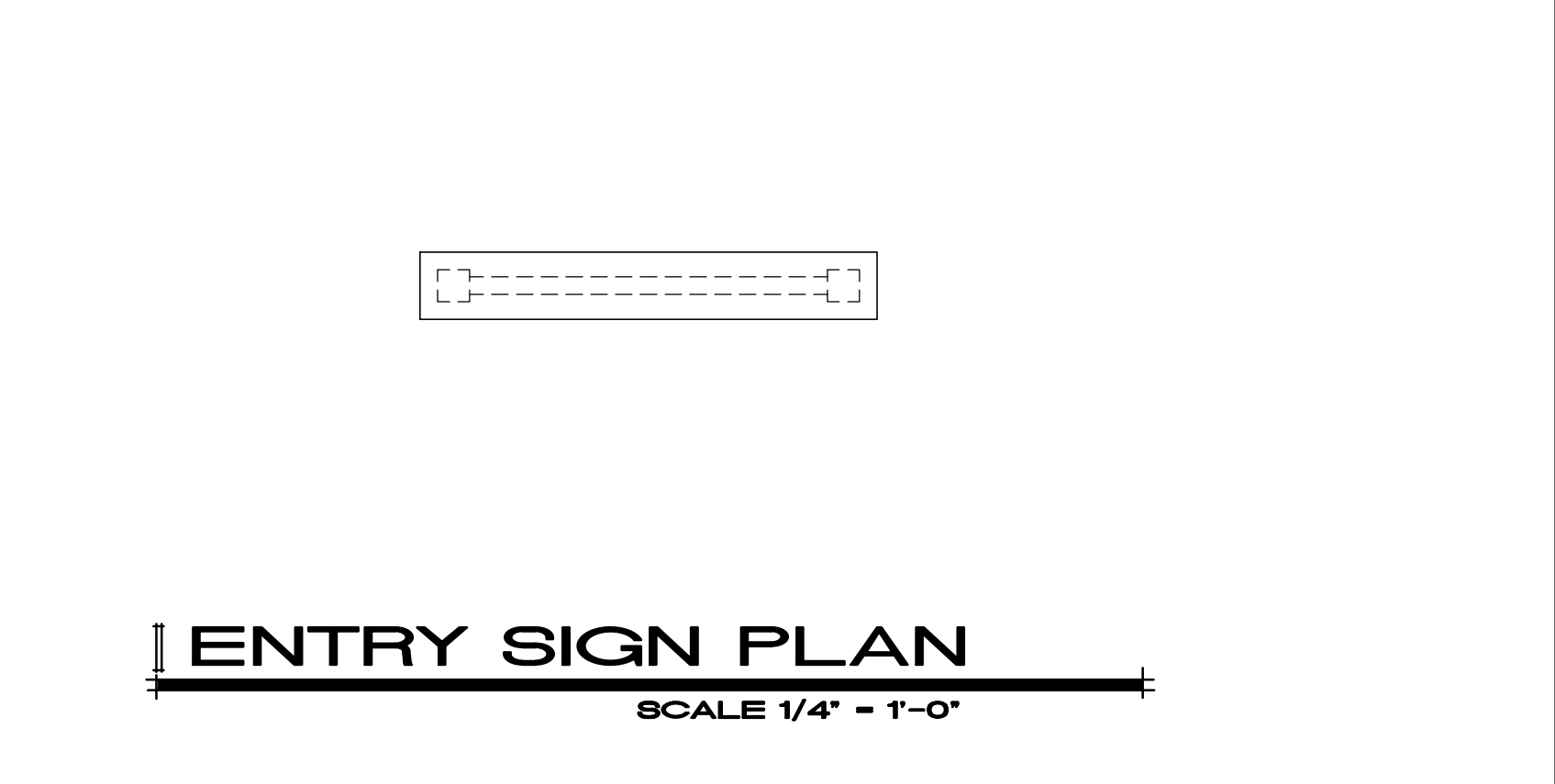
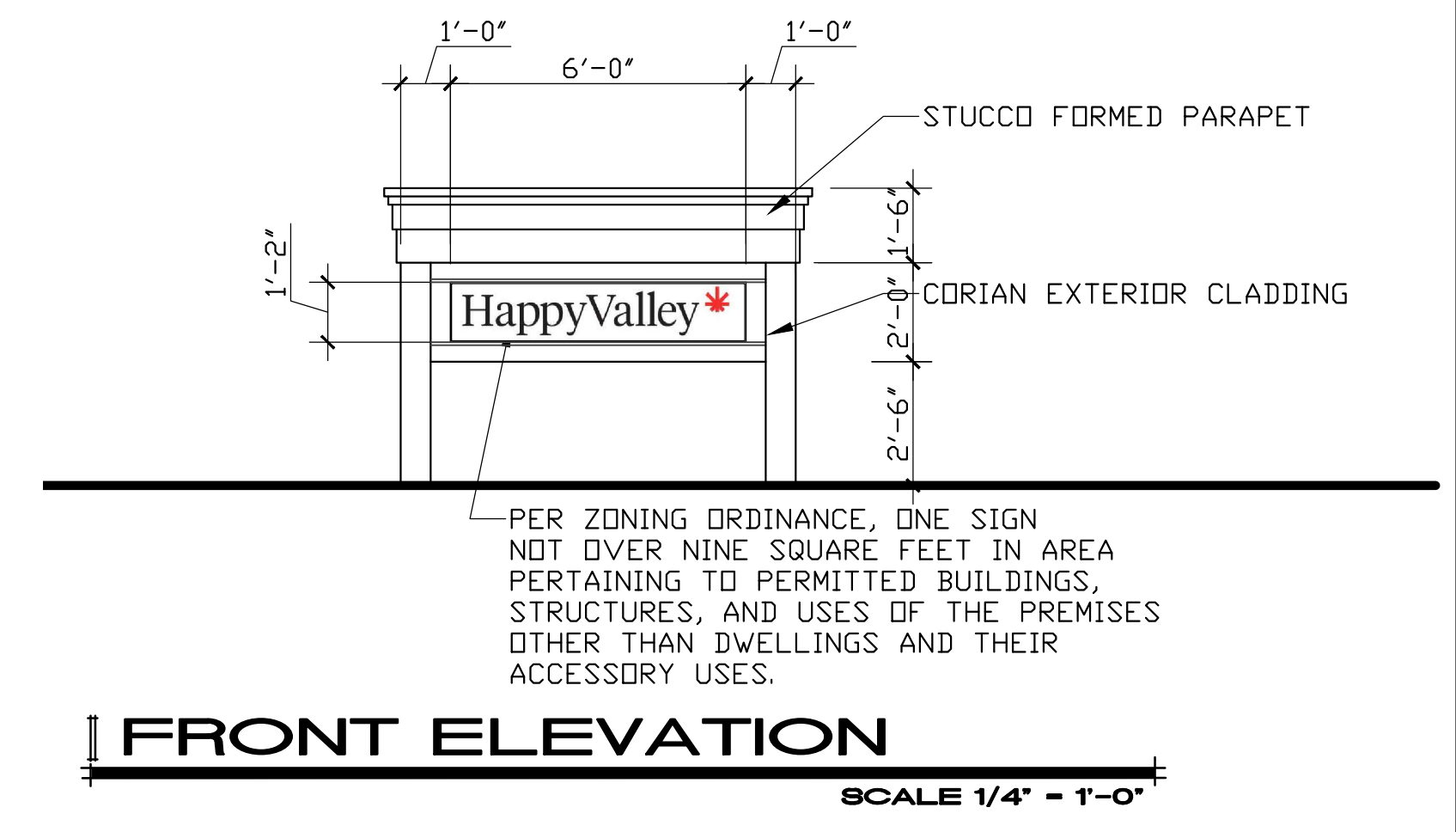
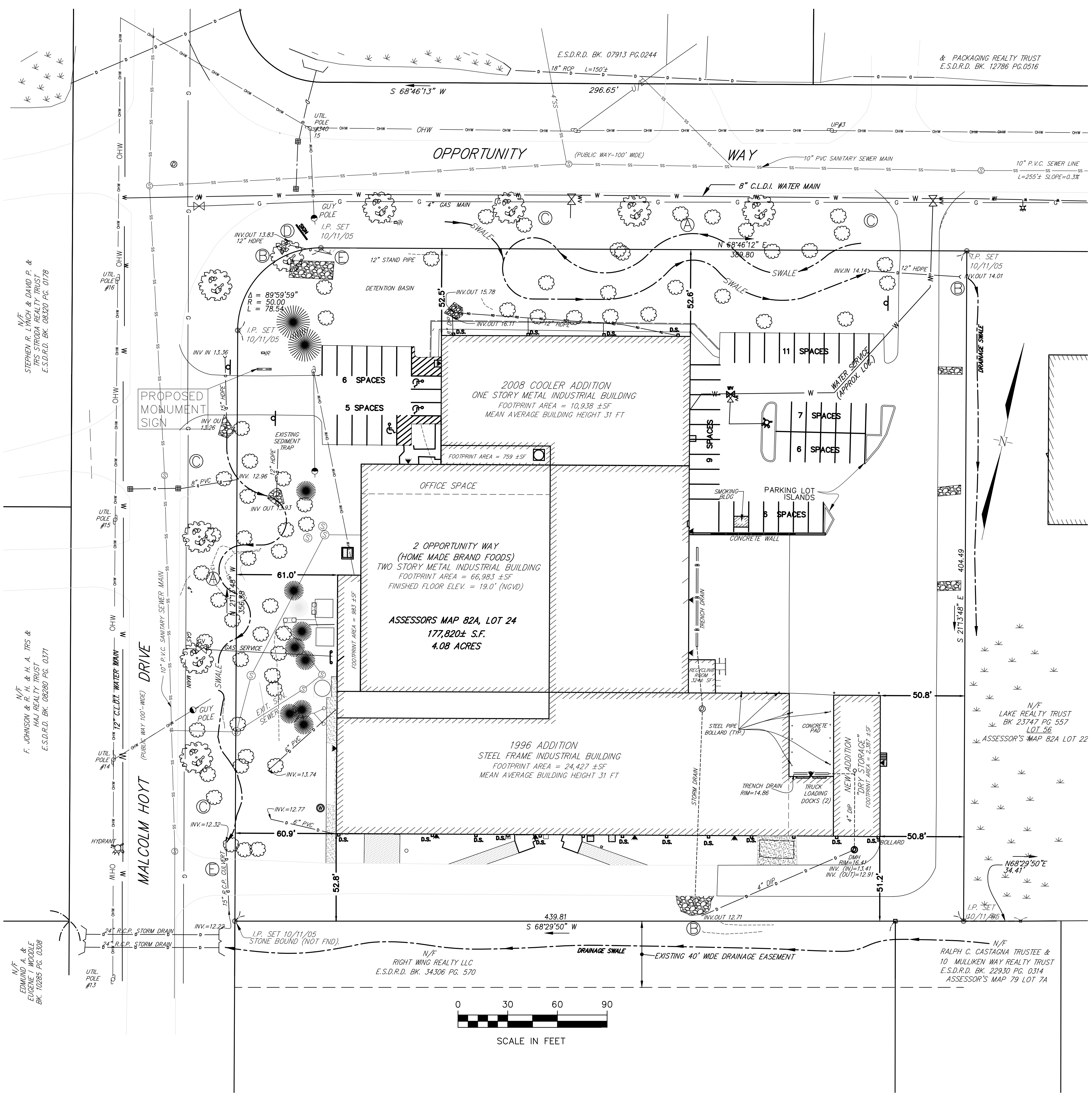
NO.	DATE	BY	REVISIONS

FIELD: T.P.T.  
CALCS: T.P.T.  
CHECKED: EJC  
APPROVED: EJC

ZONING DIMENSIONAL COMPLIANCE PLAN  
  
2 OPPORTUNITY WAY

PLAN OF LAND IN  
NEWBURYPORT, MASSACHUSETTS  
SURVEYED FOR  
HVV MASSACHUSETTS, INC

PROJECT NO.  
2018-2 OPPORTUNITY  
DATE: JUNE 20, 2018  
SHEET NO.  
1 OF 1



HVV Newburyport, LLC  
 2 Opportunity Way  
 Newburyport, MA 01950

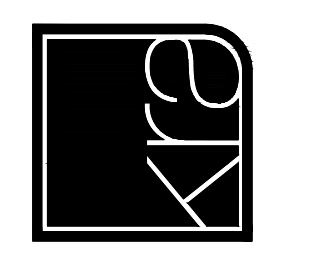
**HappyValley** \*

Applicant:  
 HVV Massachusetts, Inc.  
 39 Country Club Way  
 Ipswich, MA 01938

Owner:  
 Port Development, LLC  
 343 High Street  
 Newburyport, MA 01950

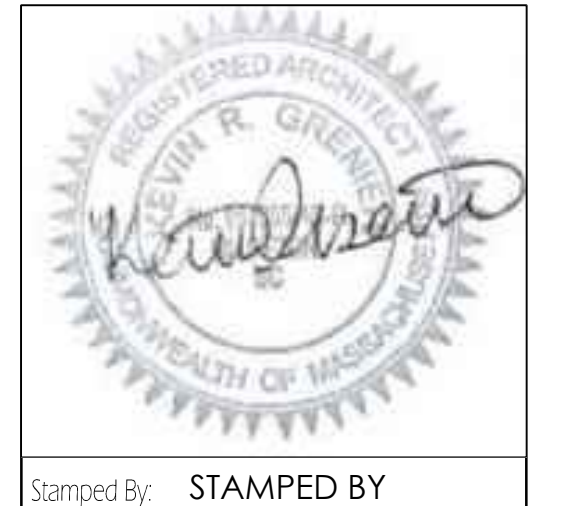
Surveyor:  
 Winter GEC, LLC  
 34 Winter Street  
 Newburyport, MA 01950  
 978-270-8626

Architect:  
 KRA Architecture and Design  
 PO Box 2047  
 Bluffton, SC 29910  
 843-815-2021



KRA architecture + design

t 843.815.2021  
 f 843.706.9460  
 www.kracad.com



Stamped By: STAMPED BY

Drawn By: KRG

Checked By:

Date: 06.12.18

Revisions:


Project No: 16108.9

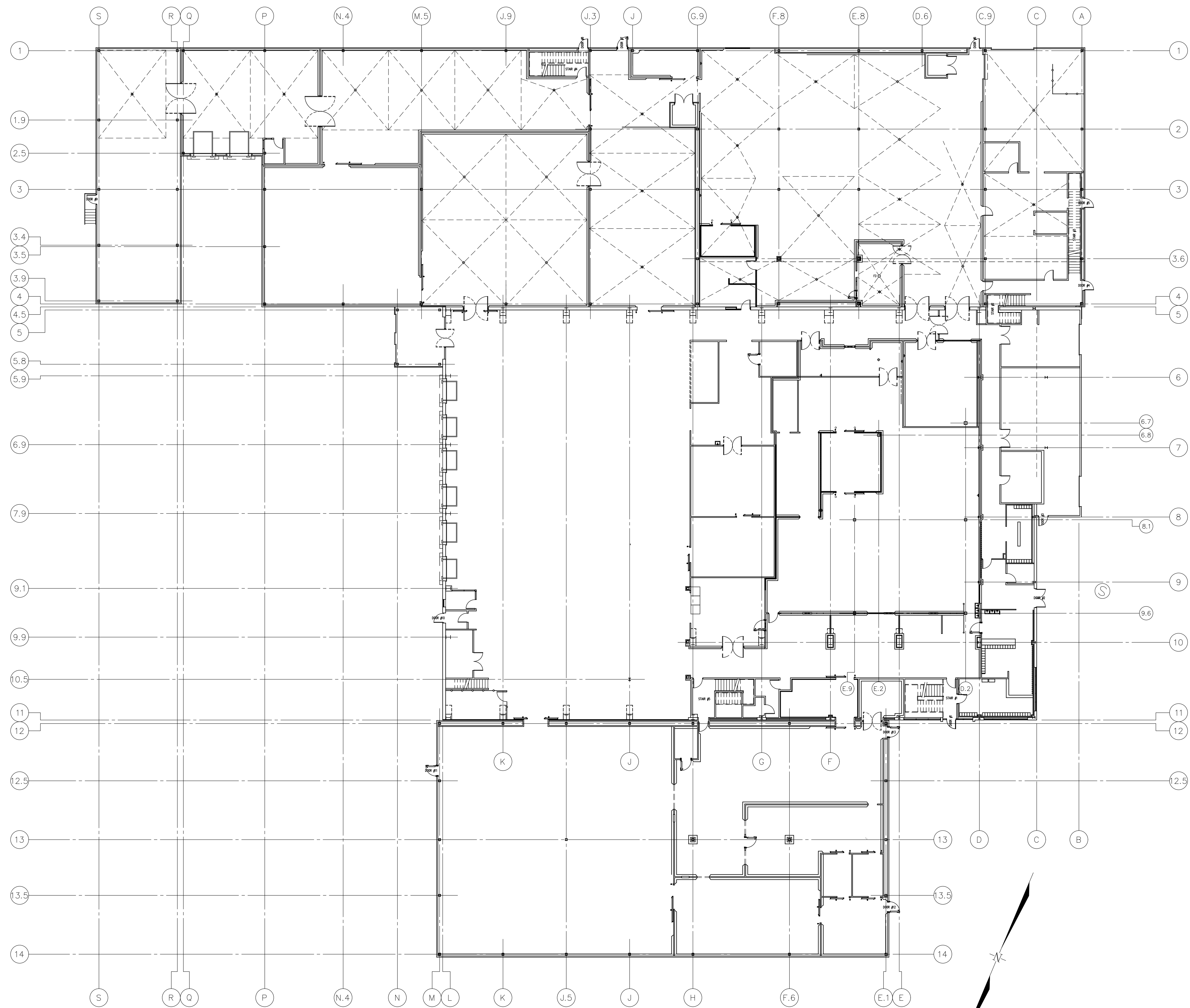
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Drawing Title:

PROPOSED  
 SITE PLAN

Sheet No: **AS1.0**

Scale:



**EXISTING GROUND FLOOR PLAN**  
 1/16" = 1'-0" 66,988 SF THIS FLOOR

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HVV Newburyport, LLC  
 2 Opportunity Way  
 Newburyport, MA 01950

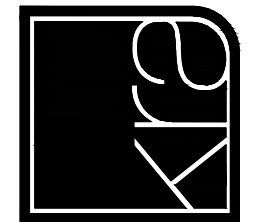


Applicant:  
 HVV Massachusetts, Inc.  
 39 Country Club Way  
 Ipswich, MA 01938

Owner:  
 Port Development, LLC  
 343 High Street  
 Newburyport, MA 01950

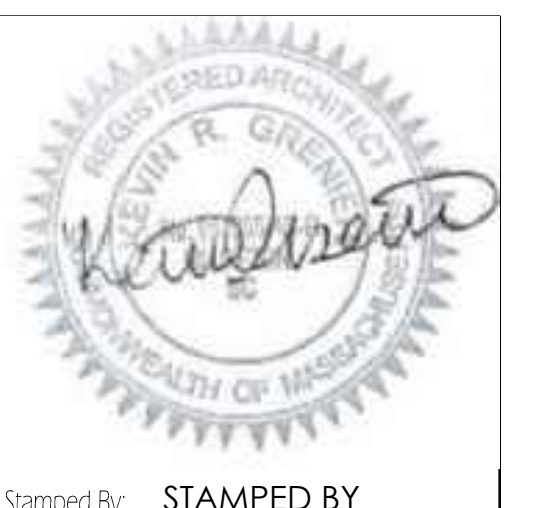
Surveyor:  
 Winter GEC, LLC  
 34 Winter Street  
 Newburyport, MA 01950  
 978-270-8626

Architect:  
 KRA Architecture and Design  
 PO Box 2047  
 Bluffton, SC 29910  
 843-815-2021



KRA architecture + design

t 843.815.2021  
 f 843.706.9480  
 www.krasc.com  
 KRA architecture + design  
 7 Johnson Way PO Box 2047  
 Bluffton, SC 29910



Stamped By: **STAMPED BY**

Drawn By: **KRG**

Checked By:

Date: **06.12.18**

Revisions

No.	Description

Project No: **16108.9**

File Name:

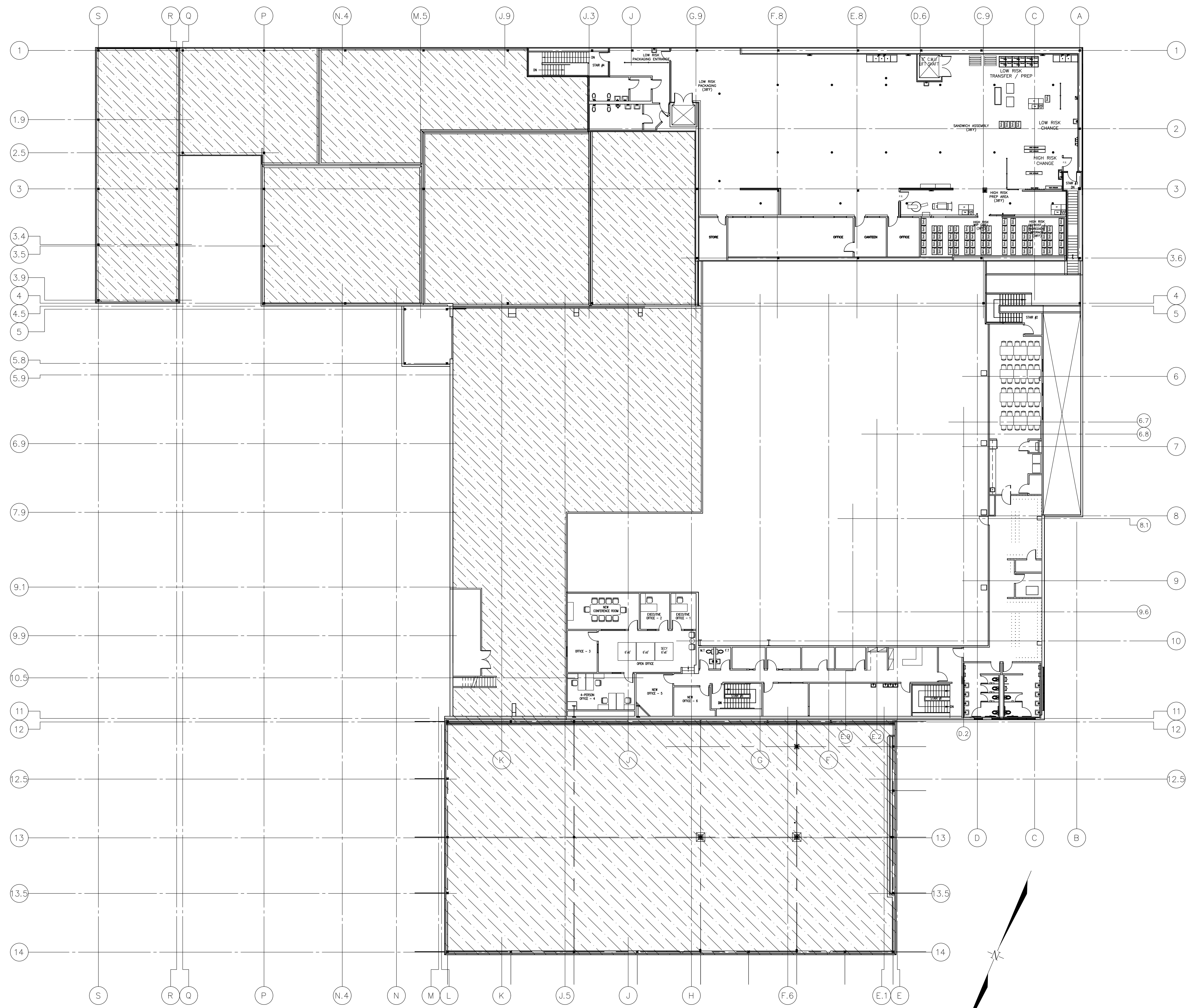
Drawing Title:

**EXISTING  
 GROUND FLOOR PLAN**

Sheet No: **EX1.1**

Scale:





EXISTING SECOND FLOOR PLAN  
 1/16" = 1'-0"  
 16,287 SF THIS FLOOR

HVV Newburyport, LLC  
 2 Opportunity Way  
 Newburyport, MA 01950

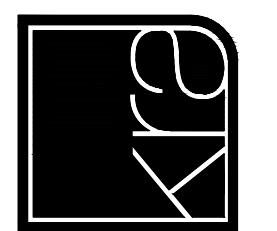


Applicant:  
 HVV Massachusetts, Inc.  
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 Ipswich, MA 01938

Owner:  
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 343 High Street  
 Newburyport, MA 01950

Surveyor:  
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 Newburyport, MA 01950  
 978-270-8626

Architect:  
 KRA Architecture and Design  
 PO Box 2047  
 Bluffton, SC 29910  
 843-815-2021



KRA architecture + design

843.815.2021  
 843.706.9460  
 www.krasc.com



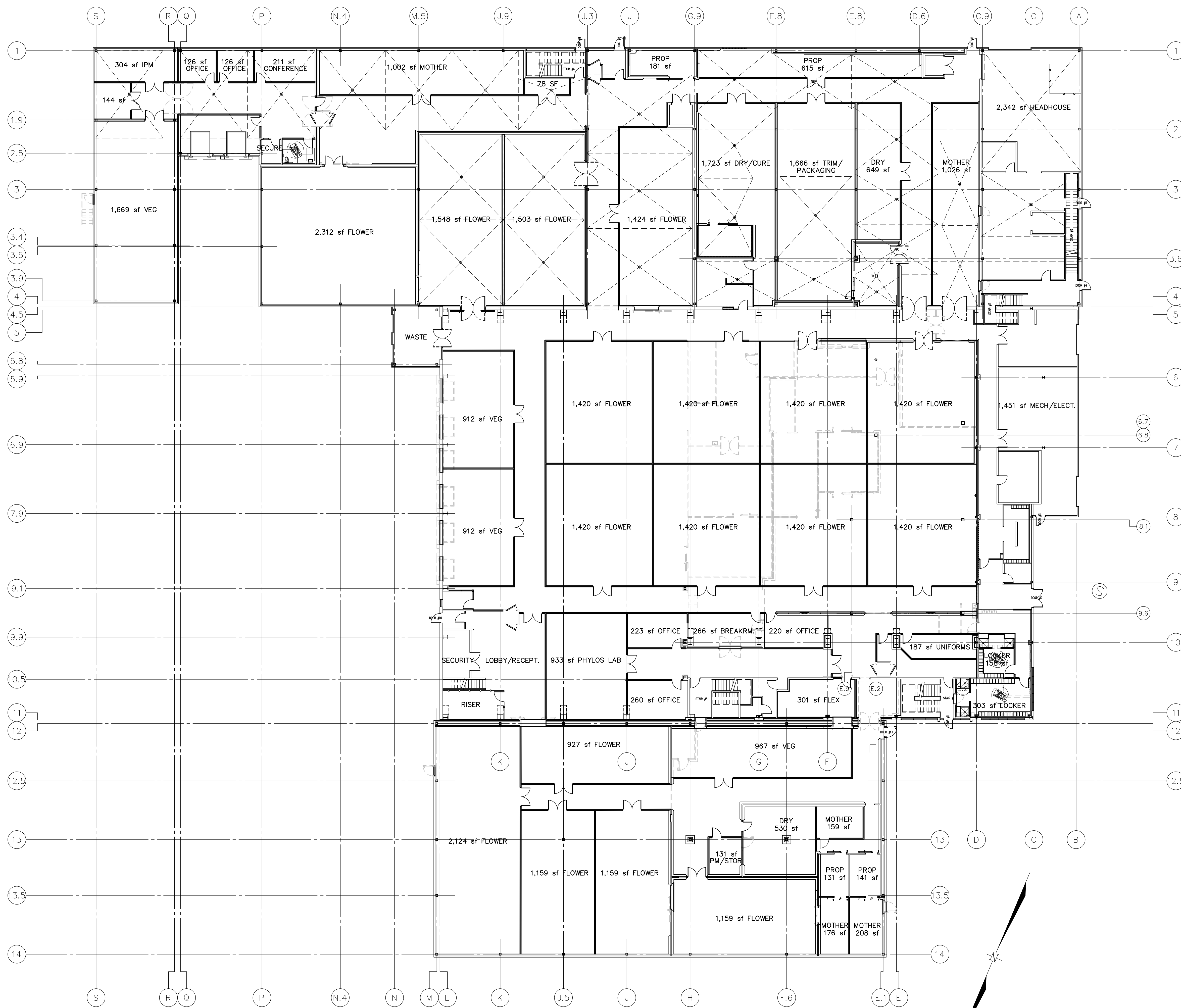
Stamped By: STAMPED BY  
 Drawn By: KRG  
 Checked By:  
 Date: 06.12.18  
 Revisions:  


 Project No: 16108.9  
 File Name:  
 Drawing Title:

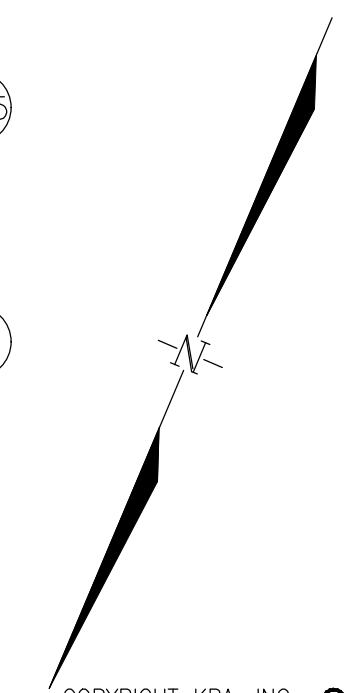
EXISTING  
 SECOND FLOOR PLAN

Sheet No. **EX1.2**

Scale:



**PROPOSED GROUND FLOOR PLAN**  
 1/16" = 1'-0" 66,988 SF THIS FLOOR



HVV Newburyport, LLC  
 2 Opportunity Way  
 Newburyport, MA 01950

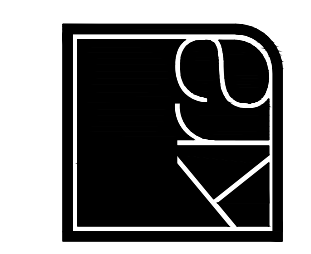


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 HVV Massachusetts, Inc.  
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Architect:  
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 843-815-2021



KRA architecture + design

1 843 815 2021  
 1 843 706 9480  
 www.kraarc.com  
 KRA architecture + design  
 7 Johnson Way PO Box 2047  
 Bluffton, SC 29910



Stamped By: STAMPED BY  
 Drawn By: KRB  
 Checked By:  
 Date: 06.12.18  
 Revisions  


 Project No: 16108.9  
 File Name:  
 Drawing Title:

**PROPOSED GROUND FLOOR PLAN**

Sheet No. **A1.1**

Scale: