

LAW OFFICE OF
HÉCTOR E. PIÑEIRO, P.C.

HÉCTOR E. PIÑEIRO

ROBERT A. SCOTT

NANCY CRUZ DE PIÑEIRO
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CORRESPONDENT

MARÍA S. PIÑEIRO SOLER, L.L.M.
EDIFICIO PONCE DE LEÓN
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SAN JUAN, PUERTO RICO 00918
TEL: (787) 250-8304
FAX (787) 758-4236

March 15, 2021

By email: BuckM@leicesterma.org

Michelle Buck, Town Planner
Town of Leicester
Leicester, MA 01586

RE: Supplemental information to application for Special Permit for Outdoor Marijuana
Cultivation Leon H. Dykas III
Town Meadow Farm 124 Green Street, Leicester, MA

Dear Ms. Buck:

I wanted to provide the Planning Board additional information or comments in response to Quinn Engineering, Inc., March 15, 2021 follow-up letter to the Leicester Planning Board. I will respond to those items that Kevin J. Quinn, P.E., identified as "Comment Stands."

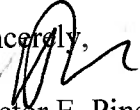
Comment Stands at ¶ 2: It is correct that the fence to the growing area was relocated in our engineering drawings. The reason I made the additional comment on our March 11, 2021 letter is because we have also considered merging the two deeds of Mr. Dykas' properties in order to meet the set-back requirements under Leicester's zoning bylaw.

Comment Stands at ¶ 4: We hired and delivered today via email to Chief Antavanica a copy of our security plans (8 pages of plans) with a three page narrative report prepared by Michael Terrizzi, Sales Engineer from Platinum Protection Systems, LLC of Methuen, Massachusetts. In his narrative report he addresses our proposed fully integrated security information management system, signage, visitor access, video surveillance system, alarm system, access control and intercom system as well as a discussion on our generator system.

Comment Stands at ¶ 5: Please note that our security plan submitted to Chief Antavanica addresses this concern as well, i.e., that the site will be able to remain operational during a power outage in accordance with 5.15.04, C,7, i).

Paragraph 11: No further comment: Please note that the plan does reflect the area of planting odor control species.

Thank you.

Sincerely,

Hector E. Pineiro

Enclosure

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Our odor mitigation consists of approximately 31,000 S.F., of seeding of mint and peppermint around the west north and east exterior perimeter of our fence. We intend to plant approximately two hundred additional plants of perennials and for other species we intend to plant I refer you to our detailed exterior planting section contained in our March 11, 2021 letter to the Planning Board (attached). I am also enclosing an outdoor adult use cultivation facility security outline prepared by Michael Terrizzi, Sales Engineer for Platinum Protection Systems, LLC. It contains a narrative and details on our video and security system.¹

I also understand there were some questions pertaining lighting and that the Leicester zoning bylaw require that light glare be minimized on abutting properties. You may remember that in our March 11, 2021 letter we informed the planning board that exterior lighting would not be continuous during the night. It will be triggered only by sensor activity. We have been alerted by our security consultant to the CCC regulations at 935 CMR 500.110 (1)(k) (Security

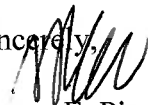
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Requirements for Marijuana Establishments) which provides “Ensuring that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance where applicable.” We recognize the conflict between our zoning bylaw and the CCC regulations and intend to work with the planning board and the CCC to satisfy any of these concerns.

I understand you had questions regarding point of use lighting for harvesting purposes, a point we raised in our March 11th letter to your office regarding hours of operation. This may consist of having our staff wear head lamps for harvesting, or tripod halogen lights to assist us with harvesting. During harvesting season we do not anticipate more than three truck trips per day. The trucks will not be large trucks. We intend to use a box truck or van under 10,000 pound GVW.

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¶(4)

Town Meadow Farm Cannabis Grow Odor Mitigation Plan
Introduction

The intent of our plan is to undertake vigorous efforts to mitigate the odor that will be produced due to the development and operation of a two-acre outdoor cannabis grow on the property of Mr. Leon Dykas, located at 124 Green Street in Leicester, MA. The odor mitigation plan is one of the major processes that this organization will utilize to alleviate the impact that a cannabis grow can have on a community. This organization's goal is to responsibly provide a new cash crop to a local farm and help preserve some of the natural, agricultural heritage of Central Massachusetts while avoiding detriment to the surrounding community.

¹ It also includes a Stormwater Operation and Maintenance Plan & Long-term Pollution Prevention Plan, Stormwater Drainage Analysis and plan.

Project Location

The project is located on Town Meadow Farm, a 141 acre farm at 124 Green Street in Leicester, MA (see Figure 1). The location of the grow itself is strategically setback from the road and the nearest residential buildings (see Figure 2) in order to reduce the impact on the surrounding community. This is a much greater setback than has been proposed as regulations in other towns such as the 100 feet proposed by Williamstown, MA. The project is set on top of a secluded hill that receives substantial northward wind which will move the odor away from the residential areas located to the South of the project site. The hill itself is situated in the middle of Dykas' property, which is an actively farmed parcel surrounded by farmland and undeveloped woodland. Adjacent to the site is an additional 81 acres of working farm owned by Mr. Dykas. There are no retail businesses in the area to be affected by this project. The location of this project maximizes the effect of every odor mitigation process being implemented. By locating the project on a secluded hilltop that receives general wind patterns away from the nearest residential areas this organization has set itself up to be successful in its odor mitigation plan from the startup.

Spatial Analysis

The spatial analysis of the project revealed that the closest residential building to the grow site is that of the property owner of 124 Green Street, Mr. Leon Dykas who is invested in the project. Other abutters are appropriately distanced from the site. In addition the farm has natural barriers that will reduce the impact of any odor produced by the project.

Mitigation Techniques

Structural/Mechanical

This organization is installing an opaque 600 foot by 300 foot fence around the entire perimeter of the grow. The fence will not only contain much of the odor produced but will also act as the bulwark for the odorous groundcovers to be planted on either side of it. We have chosen peppermint as the primary odorous groundcover. See **Exhibit 1** –photograph of a similar fence. Peppermint produces high amounts of potent essential oils such as menthol, limonene, and linalool. These oils will act as a mask for the terpenes that the cannabis plants will be producing.

Strain Selection

This organization will grow cannabis strains that are not high in noxious terpenes. Some of the terpenes produced by certain strains of cannabis have reputations for producing potent odors that many people are sensitive to. As a result, the strains that have been selected for this project in general do not produce high levels of these volatile organic compounds. Despite the limitations this will put on the organization it is a compromise that is built into the odor plan for the benefit of the community.

Cyclical Planting and Harvest

It is important to understand the whys and whens of Cannabinoid odor production and live odor in the plant cycle. A mature plant in flower is at its peak harvest time when it is on the cusp of becoming odorous. While mature plants can smell, it is in our best financial interest to remove these plants from the field before odor is an issue. The plant's terpenes values are at their highest, and if we let it run past that point the total value of our field drops dramatically. Similar to most agriculture, this grow will consist of staggered planting and staggered harvesting. At no point in

time will we have a field of fully matured plants. We have a tiered set up to have 8-10 different harvest times. Meaning no more than 10 - 12.5 % of the field will be mature at any one time.

Non-Cannabis Crops

We have chosen to give up some of the growing medium of the project to grow other non-cannabis crops that have odors of their own. The plants have been chosen to produce odors throughout the growing season and a planting of each will divide every cannabis plant. In total 3,000 Milkweed, Lemon Balm, Cerastium, Lavender (*lavandula angustifolia*) and Dill plants will accompany the 3,000 cannabis plants within the growing area.

Exterior Plantings

A 20 foot Peppermint ground cover will be planted around the perimeter of the fence and it will be maintained and routinely mowed to encourage vigorous oil production. Peppermint produces a variety of oils that are used in perfumes due to the potency of the oils. A plant will be planted every four squared feet to allow the plants to spread, grow, and produce an effective odorous groundcover. Sunflowers will be planted every five feet around the fence to attract pollinators and act as a green odorous fence. The same is true for lavender.

Four eight by eight foot herb plots will be installed near the southern boundary of the grow. Six plants of lavender, sage, and thyme will be grown in each of these plots. These herbs have been chosen for their pleasant scents and for their medicinal and culinary uses. Lavender for example is commonly used in perfumes due to its high levels of linalool, pinene, and myrcene all of which are considered to be relaxing, pleasant odors. Sage produces terpinolene, limonene, and myrcene. While Thyme produces thymol, carvacrol, and geraniol. These herbs and the potent oils they produce will attract pollinators and provide a pleasant odor to mask the odor of the cannabis throughout the growing season.

Four eight by eight foot flower plots will be installed near the southern boundary of the grow. Six plants of Orienpet, Lily, Peony, Aster, Echinacea, Dianthus will be planted in each of these plots. These flowers have been chosen for their pleasant aroma and their pleasing aesthetic quality. Orienpet Lily for example produces pinene, myrcene, and limonene. Peony will produce caryophyllene, linalool, and citronellol. Aster will produce germacrene, pinene, and caryophyllene. Echinacea will produce myrcene, pinene, and limonene. Dianthus will produce ocimene and caryophyllene. These flowers and their powerful oils will attract pollinators and provide a pleasant odor to mask the odor of the cannabis throughout the growing season.

Conclusion

This Odor Mitigation Plan describes the steps that will be taken by this organization to mitigate the odor produced by the construction and operation of a 2-acre cannabis grow at Town Meadow Farm. Included in this plan is an intensive planting to combat odors. This plan outlines how this organization will through: site selection, the use of existing and newly planted natural barriers, the construction of structural barriers, the planting of odorous and odor suppressing non-cannabis

species, and the overall strain selection of the grow in order to minimize the odor emitted by the proposed outdoor cannabis grow at Town Meadow Farm.²

¶ 5 Lighting and general operations ¶8.

Work lighting and hours of operation are interrelated. The Planning Board asked the petitioner for additional information on lighting. Specifically, "What security lighting, if any, is required by the Cannabis Control Commission (CCC)? Describe the use of outdoor lights for farming operation."

Response:

The CCC has very specific regulations for indoor cultivation lighting. See, e.g., 935 CMR 500.120(11)(b)(1)(2)(3). For outdoor cultivation, their rules are as follows:

Outdoor Cultivation shall mean the cultivation of mature Cannabis without the use of artificial lighting in the Canopy area at any point in time. Artificial lighting is permissible only to maintain immature or vegetative Mother Plants. The remaining lighting provisions of the CCC appear primarily targeted towards indoor cultivation. 935 CMR 500.002 in the definition section at pp. 110 of the regulations.³

Security lighting: the interior and exterior security lighting is not continuous during the night. Security lighting is triggered only by sensor activity.

Hours of operation

Hours of operation and lighting are coterminous (dependent). Normal hours of operation will be dawn to dusk seven (7) days a week similar to any other agricultural activity. Working under natural light will be the preferred method of operation. However, weather and progress in planting and the demand of harvest may dictate work hours beyond daylight time. For instance,

² We consulted with another colleague running an outdoor cultivation site similar to our proposal. They notified us that they are going into their fourth growing season and that do date have not experienced any odor complaints.

³ Industrial F-1, as further defined in guidelines issued by the Commission.

(b) Lighting used for Cannabis Cultivation must meet one of the following compliance requirements:

1. Horticulture Lighting Power Density must not exceed 36 watts per square foot, except for Tier 1 and Tier 2 which must not exceed 50 watts per square foot; or
2. All horticultural lighting used in a facility is listed on the current Design Lights Consortium Solid-state Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission as of the date of license application, and lighting Photosynthetic Photon Efficacy (PPE) is at least 15% above the minimum Horticultural QPL threshold rounded up to the nearest 0.1 $\mu\text{mol/J}$ (micromoles per joule).
3. A facility seeking to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission shall seek a waiver pursuant to 935 CMR 500.850 and provide documentation of third-party certification of the energy efficiency features of the proposed lighting. All facilities

935 CMR 500.120 (11)(b)(1)(2)(3)

during spring time, natural sunlight can last up to fifteen hours a day. As the summer progresses into the fall solstice months natural daylight is shorter.

Early spring

Once the greenhouse can sustain above freezing temperatures during the night, growing activity will slowly begin. Per our security plan before any work activity starts, there will be testing and implementation of the security plan.

You have also inquired about the length of our season: We submit the start of our season will be between approximately March and the month of May, weather dependent.

Mid Spring

During April and May most of our work will be dedicated to preparation and construction of the site to bring the necessary facilities. Some of our workers will involve greenhouse work and soil preparation.

Early fall and harvesting

We anticipate harvesting between late August thru October. Obviously the days will grow shorter thru the fall equinox (Sept. 21st). It is also hurricane season in New England with high winds, excessive rain. Thus, in some cases harvesting may continue thru the night. Work light are only meant for the safety of our employees and functionality. We may require point of use lighting to help facilitate harvesting.

¶6

We have retained the professional services of Platinum Protection Systems, LLC of 15 McGrath Road, Methuen, Massachusetts. As you probably know this company is involved in the Millbrook project on Huntoon Highway, Leicester, MA. Upon information and belief, this company has done over twenty-two marijuana establishment security plans in the Commonwealth. Mr. Dykas, Chief of Police Antanavica and Mr. Terrizzi from Platinum protection have already met and discussed the details of the security plans. These plans will comply in every respect with CCC requirements. The security plan will address other issues including but not limited to signage on the opaque fence, signage around the entire property. We anticipate a full security plan will be submitted to Chief Antanavica by tomorrow, Friday March 12, 2021.

¶8

With respect to processing, once harvested, our harvest will be immediately removed from the farm to another facility. We do not intend to process marijuana at 124 Green Street. As far as traffic, one of the seven employees lives at the farm. The other six will come into work and we do not believe this number of employees will affect traffic on Green Street. Our product will be transported in small box trucks or vans that comply with CCC regulations. We will submit an

application to the CCC as soon as we received our approval from the Board and the host community agreement from the Town of Leicester.

We will have an opaque green colored fence. Our worker's trailer and our security trailer will both be white. Our sheds will be built with lumber and stained. Our green house will be clear. On a final footnote, we may slightly reduce the area of the security fence and may move it back 200' to its original location.

Sincerely, I remain

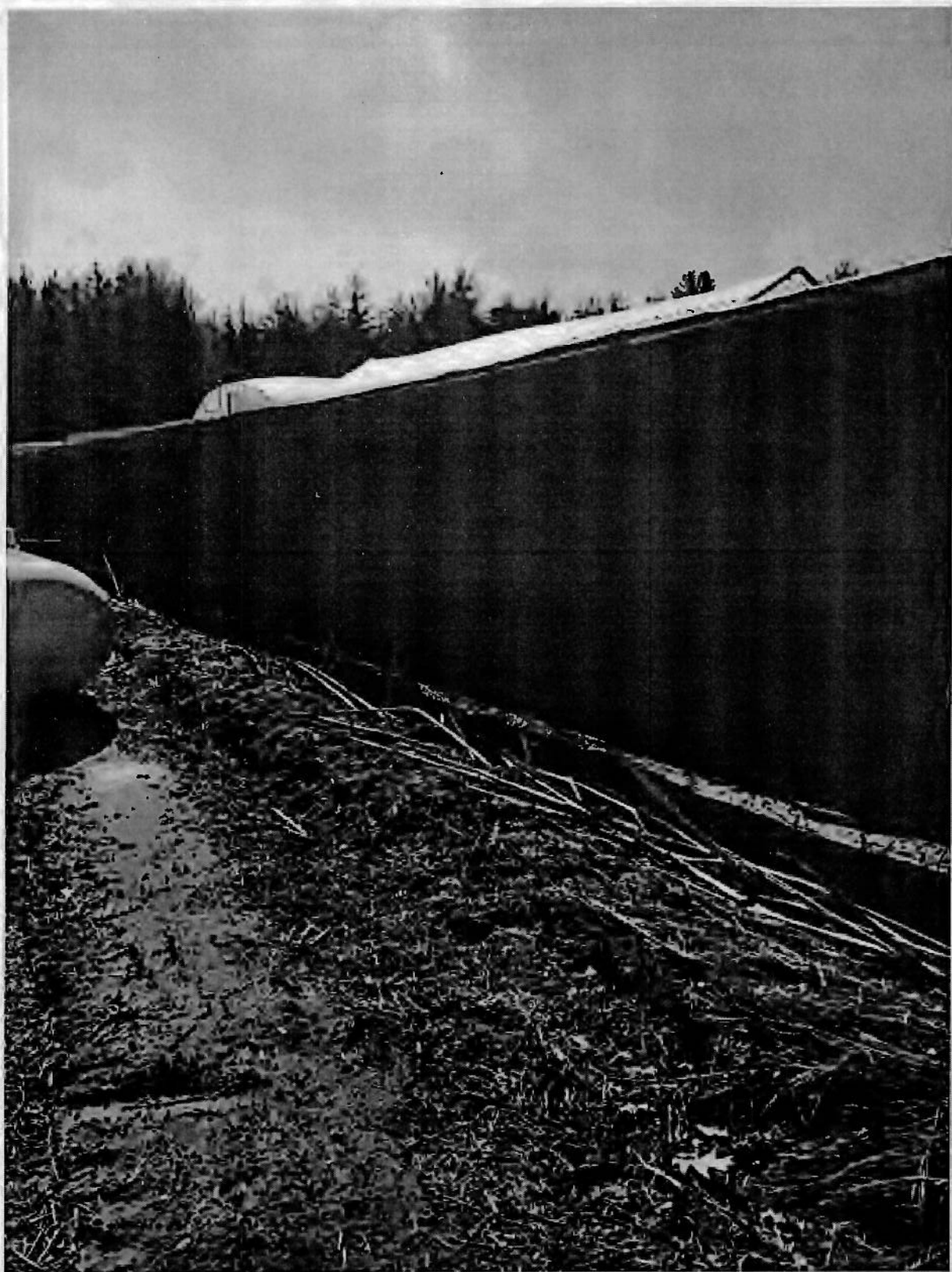


Hector E. Pineiro

Enclosure

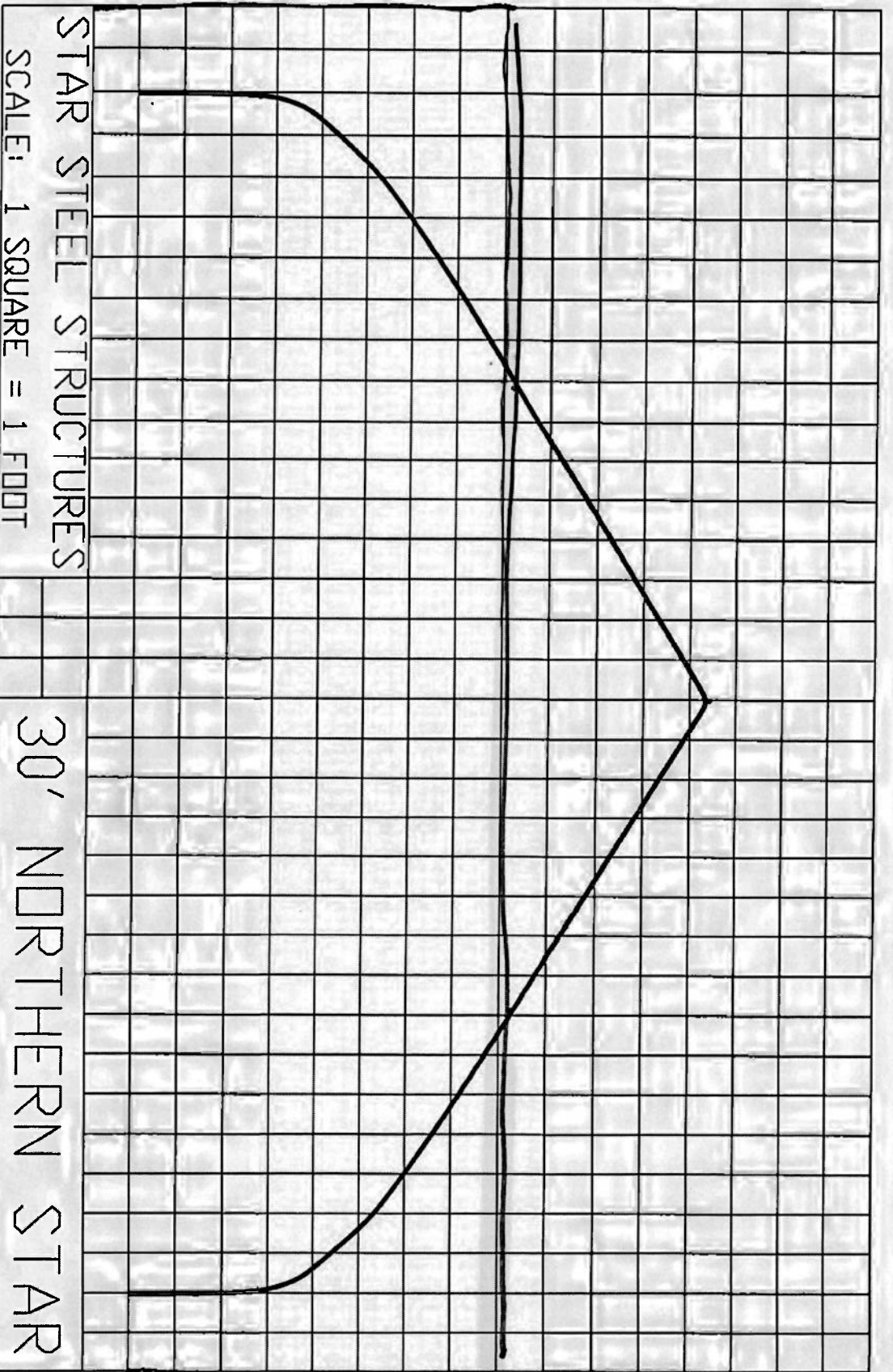
Ex. 1





N. 2

Fence



Fence



The Commonwealth of Massachusetts

General Court

March 12, 2021

TO: Leicester Board of Selectmen

RE: Special Permit and Site Plan Review of Leon Dykas, III, Town Meadow Farm to the Leicester Planning Board

Dear Members of the Board:

We write this follow-up letter to express our continued support on behalf of Leon Dykas, and Town Meadow Farm application for special permit and for site plan review scheduled with the Leicester Planning Board on March 16, 2021. We initially supported his efforts last year to Amend the Town of Leicester Zoning Bylaw in order to permit outdoor cultivation of marijuana in the Town of Leicester. Their special permit and site plan review will allow the farm, located at 124 Green Street in Leicester to cultivate cannabis outdoors. As you probably know, Mr. Dykas' property consists of approximately 140 acres of farmland and was part of the original Greene Estate, one of the oldest farms in Leicester which has been farmed since approximately 1770.

Mr. Dykas wants to do everything possible to preserve the land as a farm. We have reviewed some of the documents they have submitted to the Leicester Planning Board including their site plan and special permit application and believe that with the right controls outdoor cultivation of cannabis can produce a valuable crop that supports farming as well as jobs and state and local tax revenues without causing offensive odors or noise, and causing no appreciable change in traffic or demand for Town services.

The proposed project for 124 Green Street will allow cannabis cultivation only on land zoned suburban agricultural and only upon Town approval of a special permit and of what the law calls a "Host Community Agreement" or HCA. This will allow farmers to generate significant state and local tax revenues without adding to demand for Town or education services, and will help keep the town from being overrun by endless housing development, spiraling budgets, and suburban sprawl;

We support Mr. Dykas' special permit application because his proposal will allow him and other similarly situated farmers to make a living from farming;

Besides having to comply with the Town's zoning ordinance and special permit process, anyone proposing to cultivate cannabis under the existing bylaw will be required under state law to enter into an HCA with the Town. As part of an HCA the Town may require payment of a "a community impact fee" of up to 3% of the gross sales. The HCA must meet other requirements in the law and regulations that protect interests of the Town and of residents. See Massachusetts General Laws c. 94G § 3(d) and, as to HCAs, <https://mass-cannabis-control.com/wp-content/uploads/2018/08/Guidance-on-Host-Community-Guidance.pdf>.

Outdoor cultivation cannot be done by purely mechanical means. The crop requires skilled and semi-skilled workers and it brings in enough money to pay decent wages.

Approval of Mr. Dykas' special permit application will give Leicester a head start into this important market. At this time there is no licensed outdoor cannabis cultivation operation in Central Massachusetts and only a few licensed indoor growing facilities.

Mr. Dykas' special permit application will require strict state security measures that must be approved by the Town and by the Cannabis Control Commission, including but not limited to a securable 8' foot opaque perimeter security fence to protecting the cultivation area, a security alarm system, 24 hour man security and recorded monitored video surveillance system accessible to the Leicester Police Department.

We enthusiastically support this special permit and site plan application and urge the Planning Board to support it.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Moore".

Senator Michael Moore
Second Worcester District

A handwritten signature in blue ink, appearing to read "David LeBoeuf".

State Representative David LeBoeuf
Seventeenth Worcester District

Buck, Michelle

From: Hector Pineiro <hector@pineirolegal.com>
Sent: Tuesday, March 16, 2021 5:41 PM
To: Brooke Hammond; Buck, Michelle; ldykas@live.com
Subject: FW: Planning board letter Dykas March 16, 2021
Attachments: 4th Dykas to Leicester Planning Board Michelle Buck 3-16-2021.pdf; Dykas Platinum Operational Security Outline Platinun Security Systems, LLC 3-16-2021.docx

Dear Ms. Buck and Hammond,

Enclosed herewith please find an additional letter responsive to additional concerns raised by the Planning Board.

We also include an outdoor adult use cultivation facility security outline prepared by our security consultant.

Sincerely,

Hector E. Pineiro
807 Main Street
Worcester, MA 01610
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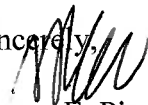
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Mitigation Techniques

Structural/Mechanical

This organization is installing an opaque 600 foot by 300 foot fence around the entire perimeter of the grow. The fence will not only contain much of the odor produced but will also act as the bulwark for the odorous groundcovers to be planted on either side of it. We have chosen peppermint as the primary odorous groundcover. See **Exhibit 1** –photograph of a similar fence. Peppermint produces high amounts of potent essential oils such as menthol, limonene, and linalool. These oils will act as a mask for the terpenes that the cannabis plants will be producing.

Strain Selection

This organization will grow cannabis strains that are not high in noxious terpenes. Some of the terpenes produced by certain strains of cannabis have reputations for producing potent odors that many people are sensitive to. As a result, the strains that have been selected for this project in general do not produce high levels of these volatile organic compounds. Despite the limitations this will put on the organization it is a compromise that is built into the odor plan for the benefit of the community.

Cyclical Planting and Harvest

It is important to understand the whys and whens of Cannabinoid odor production and live odor in the plant cycle. A mature plant in flower is at its peak harvest time when it is on the cusp of becoming odorous. While mature plants can smell, it is in our best financial interest to remove these plants from the field before odor is an issue. The plant's terpenes values are at their highest, and if we let it run past that point the total value of our field drops dramatically. Similar to most agriculture, this grow will consist of staggered planting and staggered harvesting. At no point in

time will we have a field of fully matured plants. We have a tiered set up to have 8-10 different harvest times. Meaning no more than 10 - 12.5 % of the field will be mature at any one time.

Non-Cannabis Crops

We have chosen to give up some of the growing medium of the project to grow other non-cannabis crops that have odors of their own. The plants have been chosen to produce odors throughout the growing season and a planting of each will divide every cannabis plant. In total 3,000 Milkweed, Lemon Balm, Cerastium, Lavender (*lavandula angustifolia*) and Dill plants will accompany the 3,000 cannabis plants within the growing area.

Exterior Plantings

A 20 foot Peppermint ground cover will be planted around the perimeter of the fence and it will be maintained and routinely mowed to encourage vigorous oil production. Peppermint produces a variety of oils that are used in perfumes due to the potency of the oils. A plant will be planted every four squared feet to allow the plants to spread, grow, and produce an effective odorous groundcover. Sunflowers will be planted every five feet around the fence to attract pollinators and act as a green odorous fence. The same is true for lavender.

Four eight by eight foot herb plots will be installed near the southern boundary of the grow. Six plants of lavender, sage, and thyme will be grown in each of these plots. These herbs have been chosen for their pleasant scents and for their medicinal and culinary uses. Lavender for example is commonly used in perfumes due to its high levels of linalool, pinene, and myrcene all of which are considered to be relaxing, pleasant odors. Sage produces terpinolene, limonene, and myrcene. While Thyme produces thymol, carvacrol, and geraniol. These herbs and the potent oils they produce will attract pollinators and provide a pleasant odor to mask the odor of the cannabis throughout the growing season.

Four eight by eight foot flower plots will be installed near the southern boundary of the grow. Six plants of Orienpet, Lily, Peony, Aster, Echinacea, Dianthus will be planted in each of these plots. These flowers have been chosen for their pleasant aroma and their pleasing aesthetic quality. Orienpet Lily for example produces pinene, myrcene, and limonene. Peony will produce caryophyllene, linalool, and citronellol. Aster will produce germacrene, pinene, and caryophyllene. Echinacea will produce myrcene, pinene, and limonene. Dianthus will produce ocimene and caryophyllene. These flowers and their powerful oils will attract pollinators and provide a pleasant odor to mask the odor of the cannabis throughout the growing season.

Conclusion

This Odor Mitigation Plan describes the steps that will be taken by this organization to mitigate the odor produced by the construction and operation of a 2-acre cannabis grow at Town Meadow Farm. Included in this plan is an intensive planting to combat odors. This plan outlines how this organization will through: site selection, the use of existing and newly planted natural barriers, the construction of structural barriers, the planting of odorous and odor suppressing non-cannabis

species, and the overall strain selection of the grow in order to minimize the odor emitted by the proposed outdoor cannabis grow at Town Meadow Farm.²

¶ 5 Lighting and general operations ¶8.

Work lighting and hours of operation are interrelated. The Planning Board asked the petitioner for additional information on lighting. Specifically, "What security lighting, if any, is required by the Cannabis Control Commission (CCC)? Describe the use of outdoor lights for farming operation."

Response:

The CCC has very specific regulations for indoor cultivation lighting. See, e.g., 935 CMR 500.120(11)(b)(1)(2)(3). For outdoor cultivation, their rules are as follows:

Outdoor Cultivation shall mean the cultivation of mature Cannabis without the use of artificial lighting in the Canopy area at any point in time. Artificial lighting is permissible only to maintain immature or vegetative Mother Plants. The remaining lighting provisions of the CCC appear primarily targeted towards indoor cultivation. 935 CMR 500.002 in the definition section at pp. 110 of the regulations.³

Security lighting: the interior and exterior security lighting is not continuous during the night. Security lighting is triggered only by sensor activity.

Hours of operation

Hours of operation and lighting are coterminous (dependent). Normal hours of operation will be dawn to dusk seven (7) days a week similar to any other agricultural activity. Working under natural light will be the preferred method of operation. However, weather and progress in planting and the demand of harvest may dictate work hours beyond daylight time. For instance,

² We consulted with another colleague running an outdoor cultivation site similar to our proposal. They notified us that they are going into their fourth growing season and that to date have not experienced any odor complaints.

³ Industrial F-1, as further defined in guidelines issued by the Commission.

(b) Lighting used for Cannabis Cultivation must meet one of the following compliance requirements:

1. Horticulture Lighting Power Density must not exceed 36 watts per square foot, except for Tier 1 and Tier 2 which must not exceed 50 watts per square foot; or
2. All horticultural lighting used in a facility is listed on the current Design Lights Consortium Solid-state Horticultural Lighting Qualified Products List ("Horticultural QPL") or other similar list approved by the Commission as of the date of license application, and lighting Photosynthetic Photon Efficacy (PPE) is at least 15% above the minimum Horticultural QPL threshold rounded up to the nearest 0.1 $\mu\text{mol/J}$ (micromoles per joule).
3. A facility seeking to use horticultural lighting not included on the Horticultural QPL or other similar list approved by the Commission shall seek a waiver pursuant to 935 CMR 500.850 and provide documentation of third-party certification of the energy efficiency features of the proposed lighting. All facilities

935 CMR 500.120 (11)(b)(1)(2)(3)

during spring time, natural sunlight can last up to fifteen hours a day. As the summer progresses into the fall solstice months natural daylight is shorter.

Early spring

Once the greenhouse can sustain above freezing temperatures during the night, growing activity will slowly begin. Per our security plan before any work activity starts, there will be testing and implementation of the security plan.

You have also inquired about the length of our season: We submit the start of our season will be between approximately March and the month of May, weather dependent.

Mid Spring

During April and May most of our work will be dedicated to preparation and construction of the site to bring the necessary facilities. Some of our workers will involve greenhouse work and soil preparation.

Early fall and harvesting

We anticipate harvesting between late August thru October. Obviously the days will grow shorter thru the fall equinox (Sept. 21st). It is also hurricane season in New England with high winds, excessive rain. Thus, in some cases harvesting may continue thru the night. Work light are only meant for the safety of our employees and functionality. We may require point of use lighting to help facilitate harvesting.

¶6

We have retained the professional services of Platinum Protection Systems, LLC of 15 McGrath Road, Methuen, Massachusetts. As you probably know this company is involved in the Millbrook project on Huntoon Highway, Leicester, MA. Upon information and belief, this company has done over twenty-two marijuana establishment security plans in the Commonwealth. Mr. Dykas, Chief of Police Antanavica and Mr. Terrizzi from Platinum protection have already met and discussed the details of the security plans. These plans will comply in every respect with CCC requirements. The security plan will address other issues including but not limited to signage on the opaque fence, signage around the entire property. We anticipate a full security plan will be submitted to Chief Antanavica by tomorrow, Friday March 12, 2021.

¶8

With respect to processing, once harvested, our harvest will be immediately removed from the farm to another facility. We do not intend to process marijuana at 124 Green Street. As far as traffic, one of the seven employees lives at the farm. The other six will come into work and we do not believe this number of employees will affect traffic on Green Street. Our product will be transported in small box trucks or vans that comply with CCC regulations. We will submit an

application to the CCC as soon as we received our approval from the Board and the host community agreement from the Town of Leicester.

We will have an opaque green colored fence. Our worker's trailer and our security trailer will both be white. Our sheds will be built with lumber and stained. Our green house will be clear. On a final footnote, we may slightly reduce the area of the security fence and may move it back 200' to its original location.

Sincerely, I remain

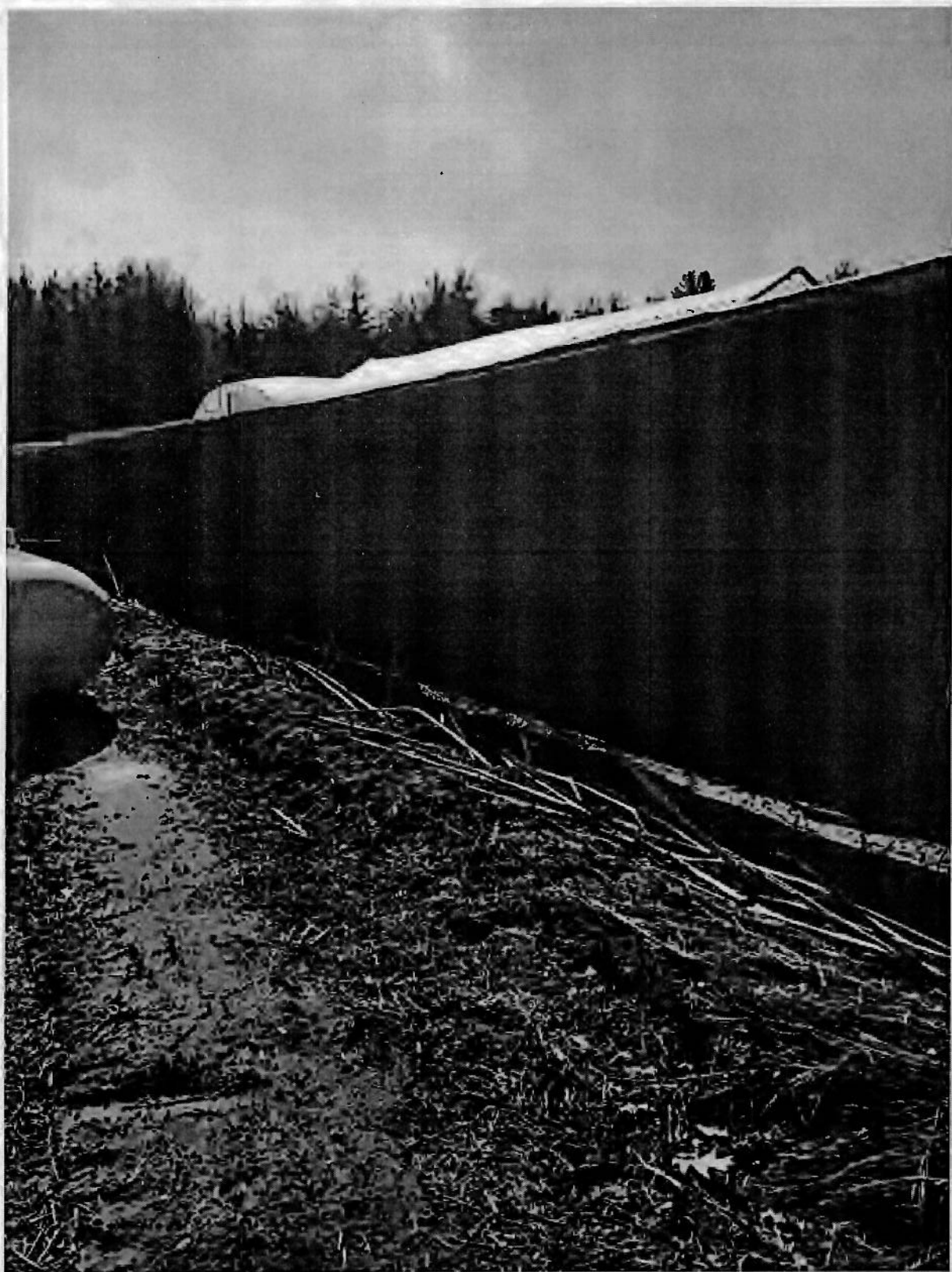


Hector E. Pineiro

Enclosure

Ex. 1

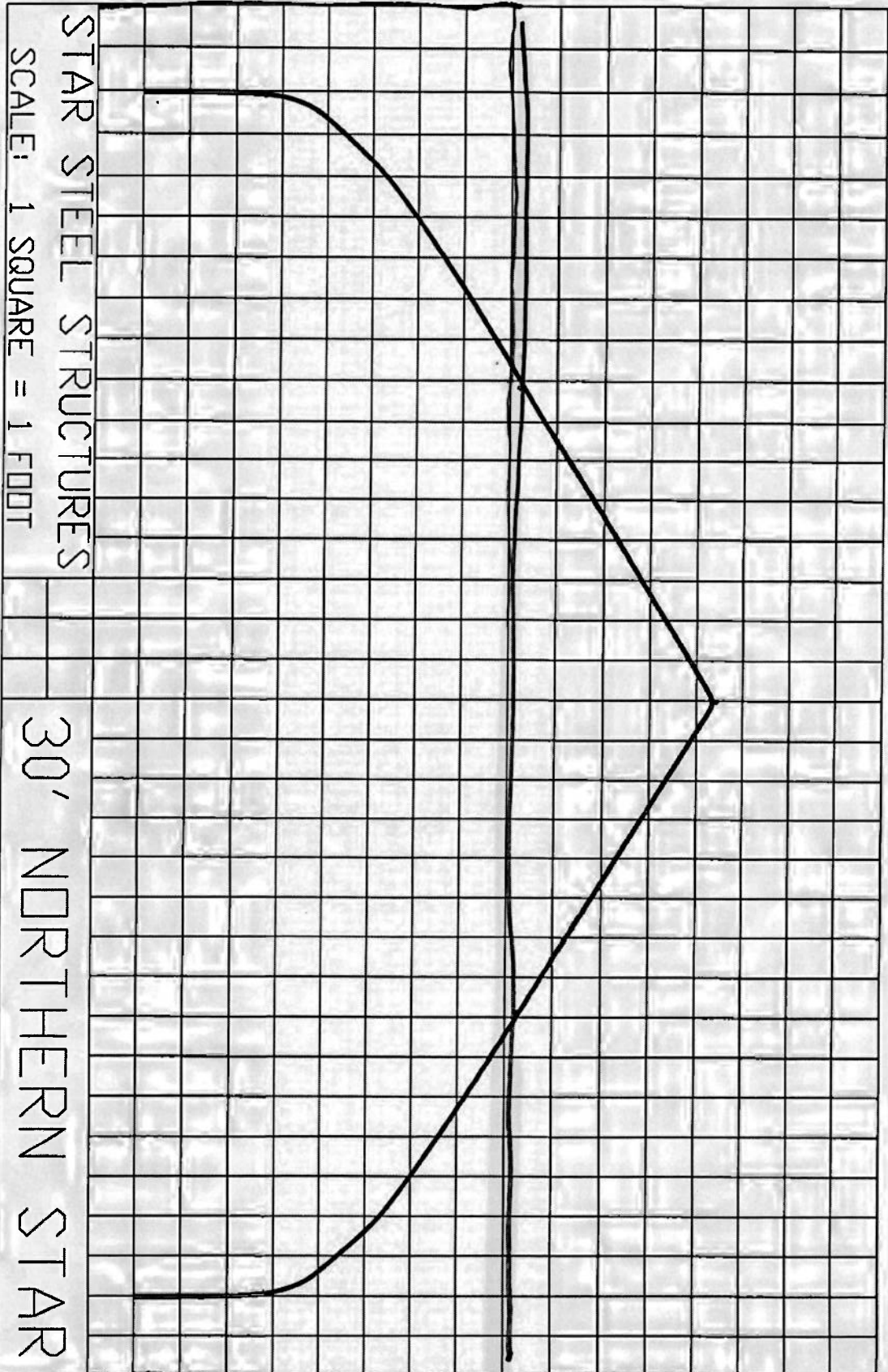




N. 2

Fence

Fence



Outdoor Adult Use Cultivation Facility Security Outline

1. Narrative
2. Video Surveillance System
3. Alarm System
4. Access Control
5. Intercom System
6. Interlock System

Narrative

The Town Meadow Farm Cultivation site will have a fully integrated physical security information management system installed at their premises. Though the video management platform software, mapping will outline all cameras at the facility and easily allow staff to follow an individual through the facility. A local alarm keypad will be installed in the security office, allowing direct access to the alarm system conditions for all zone for direct alarm events. All these assets will provide the on-staff site security officer the ability to respond quickly and appropriately to all events.

All exterior facing doors / fence areas entering the cultivation areas will be clearly marked with "Limited Access Area, Limited Access to Authorized Personnel Only" Exterior property line will be lined with "No Trespassing" signage.

All exterior entrance door, gates, storage doors will require two factor authentication. This will require staff to provide a "something they have" the access card and "something they know" a pin code to pass through a secure doorway. Once a person has authenticated that they do hold the correct card by two factors, the person can use the card on any interior doors without a pin code. Card Access doors will be installed on any doors to rooms that can contain plant material and may be left unattended and remain secure.

Visitor Access: When contractor approaches the facility a video and audio intercom will allow for two-way communication with the visitor. Once security has validated their purpose of entering the facility, security will grant access street gate, at which time they will drive up the secondary gate at the facility. At that time, the security staff will verify credentials outlined by the facilities procedural process. Provide badging and record drivers license of anyone visiting the property.

Staff Access: Staff will be allowed to enter the site from the front gate via a secure keypad. Anyone leaving the facility shall go through a personnel inspection to make sure they are not leaving the site with any plant material. Specific details on escorting staff around the facility before and after their shift will be outline in the site procedural documentation.

Video Surveillance System

Site will contain an enterprise class video management platform from Tyco Inc. called Exacq Vision Professional. This video management platform will connect and record all IP based cameras.

All cameras will record to an onsite video server containing 120TB of video storage in RAID 5 redundancy providing 90+ days of video retention. The server can expand to 240TB of storage, in the event more storage is required, dual quad core CPUs, redundant power supply, connected to a back up battery system and generator. A failure of the video recording system will trip an alarm point in the alarm system which will notify the site staff that there is a failure in the video recording system and prompt them to dispatch for service.

All cameras shall be accessible to the video workstation in security, along with ownership, police and authorized authorities to view live video, recorded video and save any video as needed.

All cameras shall be 4MP resolution Wide Dynamic Range, double that of 1080P, recording at their max frame rate to provide detailed high-resolution images of activity throughout the facility. Cameras will be in all areas that will contain or store plant material.

Cameras will be covering all aspects of the facility including exterior, interior green house and any other areas where plant material shall be present.

Alarm System

Site will contain a Honeywell VISTA series alarm panel, the commercial grade alarm panel made by Honeywell. This alarm panel will provide full site intrusion protection, included areas are cultivation gates, motion detector zones. The Honeywell alarm system will be connected with multiple redundancy paths of communication to two distinct central stations. Primary and Secondary Paths shall be via Ethernet and Cellular via Verizon network to our central station in Manchester, NH with a 5minute check in / heartbeat. The redundant path via Quad Path Radio via StarLink Transmitter shall communicate via Ethernet or Cellular via ATT to back up central station in Syracuse, NY.

This means of communication shall provide total redundancy all the way down to central station, thus if there was a catastrophic failure at an alarm dispatch center, at no time would the site not be monitored.

Since there is a required heartbeat, the central station will actually call the customer if the radio fails to check in any 5 minute interval, if the alarm system is disabled for any reason while in the disarmed state.

Full tampers and end of line resistance will be provided on all devices thus ensuring no one at the site will tamper with any devices. A combination of tri-technology motion detectors, heat, seismic and door sense modular will monitor doors any area throughout the facility. Any exterior door shall be monitored, and any emergency egress doors shall send a 24 hour alarm to the central station. Since these emergency egress doors will only be used in an emergency, this will allow the central station to promptly the call to the site security officer and have the central station dispatch the police if necessary.

All these devices will be backed up by 48 hours batteries in the event a generator fails to turn on, the site has procedural documentation on restoring power beyond the 24 hour time frame. This will allow the site to remain under intrusion detection throughout an extended power loss. A generator will turn on in the event of a complete power loss, allowing the facility to operate without any utility power connection.

Attention to detail and additional devices are installed in the dry/curing rooms, since these either almost finished product. These additional layers of security are to protect and prevent loss of product.

Access Control Systems

The access control platform is Avigilon Access Control Manager, a fully integrated physical security information management platform. At its core the system will authenticate any valid badge at access control doors, record and provide audit logs for this access. With additional feature sets, the video and alarm system components will also report and interact with this system, providing a single web browser-based screen to view all facility interactions and provide a detail recall of site activity at any time.

Main exterior entrance will have dual factor authentication, allowing authorized staff to enter the facility with valid access. Any areas that are restricted access from customer facing doors to cultivation will also require two factor authentication.

All access control doors will limit, and control required access to areas, provide a detail audit log of which rooms are accessed, when and by whom.

There will be access control on the exterior gate, allowing vehicle to enter security area to load a shipment for transport to another facility.

Intercom System

At all street and facility entrance man gate there will be a video/audio door intercom system. This will allow for two-way voice communication to the security office to a desk mounted monitor station. A customer, visitor, vendor can communicate their intention and staff and choose to unlock the door or direct them away from the facility from one central location. Each intercom's video stream will be recorded to the video management system. This will capture anyone's face that directly communicates with the facility.