

# ATTACHMENT 2

Project Application Materials



## Community & Economic Development

P.O. Box 1609, Mammoth Lakes, CA, 93546

(760) 965-3630

www.townofmammothlakes.ca.gov

### PLANNING APPLICATION - COMMERCIAL CANNABIS ACTIVITY USE PERMIT

#### SECTION A – APPLICANT / BUSINESS INFORMATION

**Type of Activity:** (check all that apply) ☒ Adult-Use ☒ Medicinal

☐ Retailer ☒ Cultivation ☒ Manufacturing (Nonvolatile) ☒ Distribution ☐ Testing

☐ Cultivation - Accessory Use to Primary Retail Use ☐ Manufacturing - Accessory Use to Primary Retail Use

**Business Organizational Structure:** ☐ Sole Proprietorship ☒ Limited Liability Company ☐ General Partnership

☐ Corporation (or foreign corporation) ☐ Limited Partnership ☐ Limited Liability Partnership

Elevation Green LLC

Elevation Green, White Mountain Distribution

Name (sole proprietorship first and last,  
all other business types legal business name)

Doing Business As (DBA)

312 Commerce Drive, Units A & B

037-200-053-000

Industrial (I)

Business Premises Address

Assessor's Parcel Number

Zoning

PO Box 3686

Mammoth Lakes

CA

93546

Business Mailing Address

City

State

Zip Code

Peter Sheldon

info@elevationgreen.com

760-914-1571

Primary Contact Person

Email

Phone Number

#### SECTION B – PROPERTY OWNER INFORMATION and EVIDENCE OF LEGAL RIGHT TO OCCUPY

David Crockett/John Stoltzfus

yokaia@qnet.com

760-934-3478

Property Owner (if other than applicant)

Email

Phone Number

PO Box 1218

Mammoth Lakes

CA

93546

Mailing Address

City

State

Zip Code

**If premises are owned by the applicant:**

☐ Copy of Title or Deed (Attached)

**If premises are rented or leased:**

☒ Copy of Lease (Attached)

☒ Property Owner Consent Form(s) (Attached)

#### SECTION C – COMMERCIAL CANNABIS ACTIVITY INFORMATION

Describe the type, nature, and extent of all cannabis activities to occur on the premises (attach additional sheets if needed):

Indoor Cultivation, Manufacturing, and Distribution

Please see attachments for additional information

Specify the type of State license(s) that will be required for the proposed activities (attached additional sheets if needed):

Microbusiness (Type 12) to include: Indoor Cultivation, Manufacturing, and Distribution

Cultivation Canopy Area: 500 sq. ft.

Nursery Canopy Area: 0 sq. ft.

Will the activity take place in an existing structure? ☒ Yes ☐ No

If yes, will any exterior modifications to the structure or site occur? ☐ Yes (Design Review may be required) ☒ No

Has an application for a building permit for any tenant improvements or new construction been submitted?

☐ Yes (BP # \_\_\_\_\_) ☒ No ☐ N/A – No improvements proposed

**RECEIVED**

**MAR 12 2021**

Hours of Operation: \*

☒ Sun 7:00 am - 10:00 pm    ☒ Mon 7:00 am - 10:00 pm    ☒ Tues 7:00 am - 10:00 pm    ☒ Wed 7:00 am - 10:00 pm  
☒ Thurs 7:00 am - 10:00 pm    ☒ Fri 7:00 am - 10:00 pm    ☒ Sat 7:00 am - 10:00 pm

\* For cultivators, manufacturers, distributors, and testers, identify the proposed delivery and shipping hours and days.  
For retailers, identify the proposed hours and days the retail store will be open to the public.

Does the business have a valid Weighmaster License issued by the CDFA?

☐ Yes (License Attached)    ☒ In Process (Completed CDFA Weighmaster License App Attached)    ☐ Not Applicable

**SECTION D – ATTACHMENTS** The following documents are required for this application to be deemed complete

☒ Site Plan    ☒ Operations Plan  
☒ Floor Plan    ☒ Weighmaster License or Application  
☐ Elevations (if exterior modifications are proposed)    ☒ Commercial Cannabis Permit Application (Chapter 5.38)  
☒ Evidence Of Legal Right To Occupy The Premises    ☒ Public Notice Packet

**SECTION E – ADDITIONAL ATTACHMENT REQUIREMENTS BASED ON ACTIVITY (Can be included in the Operations Plan)**

**CULTIVATION FACILITY**

☒ Water Management Plan - Provide information on the anticipated water usage, water conservation measures, and wastewater discharge  
☒ Energy Usage Plan - Provide information on projected energy demand and any renewable energy features  
☒ Pest Management Plan - Provide information on how pests will be managed and what, if any, pesticides will be used and how they will be stored  
☒ Fertilizer Plan - Provide information on how plants will be fertilized, what products will be used, and how the products will be stored

**MANUFACTURING FACILITY**

☒ Chemical Plan - Provide information on what products will be used in the manufacturing process (i.e., liquids, solvents, agents, processes, etc.) and how those products will be stored. MSDS sheets for all chemicals are required  
☒ Hazard Response Plan - Provide information on the training that will be provided to personnel to ensure the safe operation of all equipment and what to do in the event of an accident / equipment failure  
☒ Water Management Plan - Provide information on the anticipated water usage and wastewater discharge  
☐ Provide Manufacturer Specification Sheets for all equipment  
☒ If manufacturing edible products, approval from the Health Dept. and evidence that personnel has been trained in proper food handling practices is required

**TESTING FACILITY**

☐ Chemical Plan - Provide information on what products will be used in the testing process (i.e., liquids, solvents, agents, processes, etc.) and how those products will be stored. MSDS sheets for all chemicals are required  
☐ Certificate of Accreditation from approved accrediting body (or evidence that the accreditation process has begun)

**SECTION F – USE PERMIT APPLICATION FEE**

☒ Payment of Use Permit Application Fee deposit (See Community and Economic Development Department fee schedule)

**ACKNOWLEDGEMENT AND SIGNATURE**

Under penalty of perjury, I hereby declare that the information contained within and submitted with the application is complete, true, and accurate. I understand that a misrepresentation of fact is cause for rejection of this application, denial of a permit, or revocation of a permit issued.

Signature: Peter Sheldon    Printed Name: PETER SHELTON    Date: 3/09/21

**STATEMENT ACKNOWLEDGING  
HAZARDOUS WASTE AND SUBSTANCES**

Before a local agency accepts as complete an application for any development project which will be used by any person, the applicant shall consult the list of Hazardous Waste and Substances appropriate to the Town or County and shall submit a signed statement to the local agency indicating whether the project is located on a site which is included on the list. If the site is included on the list, the list shall be specified on the statement.

Please read the following list of sites within Mammoth Lakes and the definitions of the types of hazardous waste or substances. Please sign the form in the space provided.

**MAMMOTH LAKES**

**Highway 203 and Mammoth Road (no street address)**

Unknown	UTANK
Mammoth Mountain Ski Area	FINDS
Mammoth Shell Station	LTANKS
Sierra Lodge Motel	SWRCB

**Main Street (3280)**

Former Exxon Mini Mart	LTANK
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**Star Route 1 Box 208 (no street number)**

Mammoth Hot Springs Fish Hatchery	LTANK
Airport	LTANK

See the next page for definitions.

I have read the above list of sites and the definitions of hazardous waste and substances.

3/8/21  
Date

  
Signature

The proposed development is ☐ is not ☒ on the above list. If the proposed development is on one of the above sites, please indicate which site.

## DATA SOURCE DEFINITION AND CONTACTS

1. CALSITES Department of Toxic Substances Control; Abandoned Sites Program Information System  
Ben McIntosh (916) 255-2121
2. S-1987 Facilities Reporting to the California Environmental Protection Agency;  
S-1988 for reporting years 1987, 1988, 1989, 1990 per SARA Title S-1989 III Section III (Toxic  
Chemicals Release Inventory).  
S-1990 Ken Rydbrink (916) 322-2793
3. FINDS Environmental Protection Agency (EPA); Facility Index System.  
User Support (800) 424-9067.
4. HWIS Department of Toxic Substances Control; Hazardous Waste  
Information System. Laura Sotelo (916) 323-6556
5. LTANK California State Water Resources Control Board; Leaking Underground Storage Tanks.  
Terry Brazell (916) 739-2399.
6. SWRCB California State Waste Resources Control Board; Waste Discharger System. Gertie  
Buehler (916) 657-1495.
7. SWIS California Integrated Waste Management Control Board. These are solid waste disposal  
facilities from which there is a known migration of hazardous waste.  
Sharon Anderson (916) 255-2465
8. AGT25 California Air Resources Board; Dischargers of greater than 25 tons of criteria pollutants  
to the air.  
Linda Murchison (916) 322-6021.
9. A1025 California Air Resources Board; Dischargers of less than 10 and less than 25 tons of criteria  
pollutants to the air.  
Linda Murchison (916) 322-6021.
10. UTANK California State Water Resources Control Board; Underground tanks reported to the  
SWEEPS systems.  
(800) 327-9337.

# ELEVATION GREEN LLC

## APPLICATION SUMMARY

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Elevation Green LLC is applying for a commercial cannabis permit for Adult-Use and Medical Cultivation, Manufacturing, and Distribution at 312 Commerce Drive, Units A & B, in Mammoth Lakes, CA 93546. This document is a brief summary of the proposed activities including a list of operational plans included as attachments to the application.

CULTIVATION: Elevation Green LLC's cultivation operations will include up to 500 square feet of indoor mature canopy. Separate rooms for immature plants at different growth phases include a Veg Room for immature plants, a Clone/Seedling Room, and a Mother Room. A Drying and Harvest Storage Room and a Non-Manufactured Cannabis Processing and Packaging Room shall support post-harvest processing.

MANUFACTURING: Elevation Green LLC intends to manufacture the following cannabis goods:

- *Edibles* – Gummies, hard candies, lozenges, chocolates, chocolate covered non-perishable food products, infused cooking oils and honey, and other infused non-perishable food products
- *Vape Cartridges* – Vape cartridges filled by Elevation Green LLC with concentrated cannabis oil obtained from another licensed manufacturer
- *Disposable Vape Pens* – Disposable vape pens filled by Elevation Green LLC with concentrated cannabis oil obtained from another licensed manufacturer
- *Infused Pre-Rolls* – Pre-rolls infused with concentrated cannabis obtained from another licensed manufacturer or from mechanically extracted concentrated cannabis produced by Elevation Green LLC
- *Uninfused Pre-Rolls* – Pre-rolls consisting exclusively of any combination of flower, shake, leaf, or kief
- *Mechanical Extracts* – Mechanically extracted concentrated cannabis such as hash and rosin

Elevation Green LLC's manufacturing methods will not include volatile extraction, supercritical CO<sub>2</sub> extraction, butane, propane, or ethanol solvents.

DISTRIBUTION: Elevation Green LLC will conduct the following distribution activities:

- Transportation of cannabis goods to the Elevation Green LLC premises from other licensed premises;
- Transportation of cannabis goods to other licensed premises from the Elevation Green LLC premises;
- Receive cannabis goods at the Elevation Green LLC premises from other licensed distributors (or licensed cultivators with a self-transport license);
- Conduct transportation-only services between other licensed premises;

## APPLICATION SUMMARY

- Packaging, labeling, and rolling of non-manufactured cannabis goods at the Elevation Green LLC premises;
- Storage of cannabis goods at the Elevation Green LLC premises; and
- Arranging for batch sampling and testing of cannabis goods by a licensed testing laboratory.

This application includes the following operational plans and maps:

- **SITE PLAN:** Location maps and maps of property/parcel
- **EXISTING FACILITY MAP:** Floorplan showing the layout of the existing facility
- **PREMISES MAP:** Floorplan showing the layout of proposed improvements and operations within the premises
- **WASTE MANAGEMENT PLAN:** Description of procedures for managing and disposing of cannabis waste
- **PEST MANAGEMENT PLAN:** Integrated Pest Management Plan describing the methods and products used for pest management
- **FERTILIZER MANAGEMENT PLAN:** Description of fertilizers to be used, storage, and application
- **SECURITY AND SAFETY PLAN:** Security and safety measures for the premises and operations
- **PACKAGING AND LABELING PLAN:** Description of packaging and labeling procedures
- **QUALITY CONTROL PLAN:** Overview of Operational, Employee, and Facility Quality Control Measures
- **DISTRIBUTION PLAN:** Description of distribution operations
- **INVENTORY MANAGEMENT PLAN:** Procedures for inventory management including testing, storage, and weighing
- **MANUFACTURING PLAN:** Description of manufacturing operations including edibles manufacturing, water management, and hazard response
- **CULTIVATION PLAN:** Description of cultivation operations including lighting, water management, and energy management



# ELEVATION GREEN LLC – SITE PLAN

312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546, APN 037-200-053-000

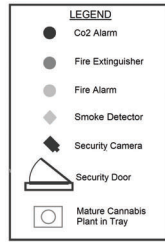
## SITE PLAN





Elevation Green LLC  
Commercial Cannabis Microbusiness  
Premises Map  
4/21/2021

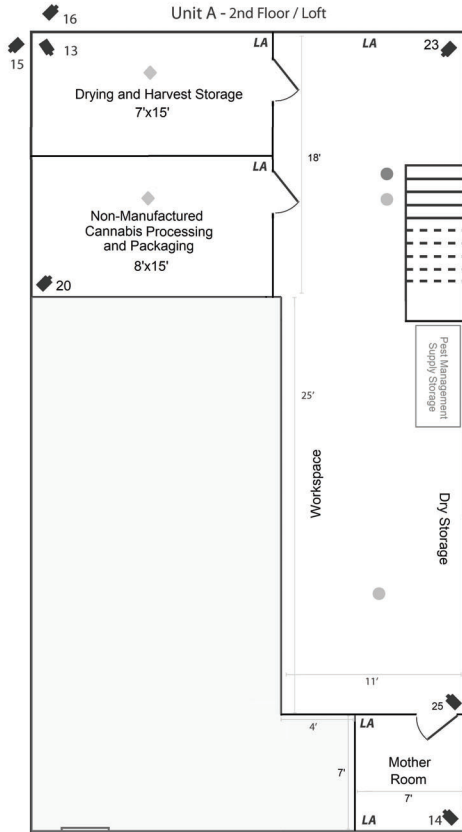
312 Commerce Drive, Units A, B & C  
Mammoth Lakes, CA 93546  
APN: 037-200-053-000



Scale  
1" = 5'

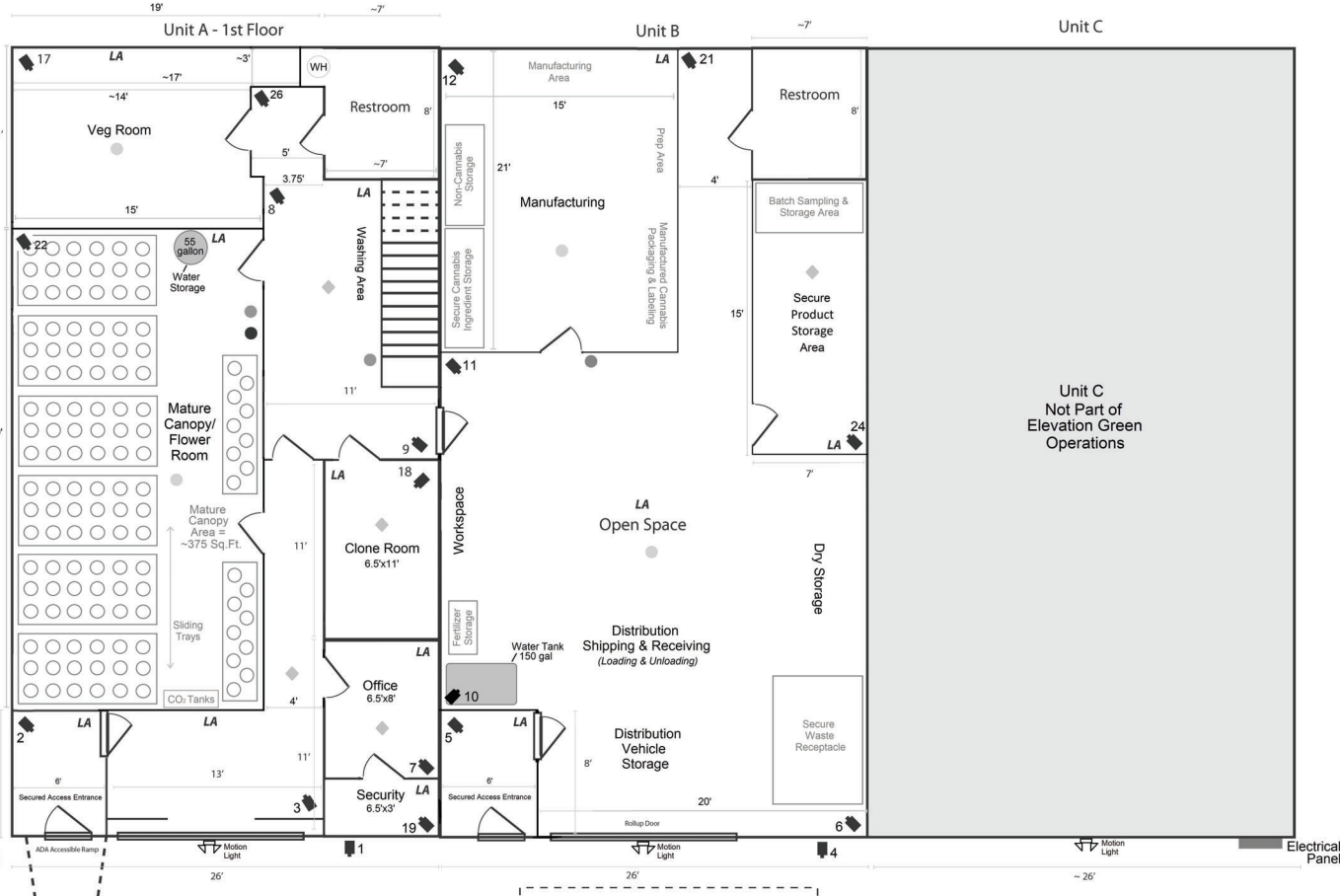
Interior of the entire  
building is secure  
and restricted

All Area within units A & B are  
Limited access.  
For the purpose of this diagram  
every room will be marked with a  
LA



Exterior of the Building

Parking



Loading and Unloading Zone

Propane  
Tank

Electrical  
Panel

# WASTE MANAGEMENT PLAN

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This Waste Management Plan has been developed for Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Waste Management Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for safe and secure management of cannabis waste generated on the premises as part of commercial cannabis business operations.

In this Waste Management Plan, cannabis waste is defined as organic waste, such as food waste, green waste, landscape and pruning waste, nonhazardous-wood waste, and food-soiled paper waste that is mixed with food waste.

## FORMS OF CANNABIS WASTE

Elevation Green LLC anticipates generating and handling the following forms of cannabis waste:

- Waste from solid plant material, whether usable plant trim or flower or unusable plant material, such as stalks, roots, or soil.
- Any plant waste or extract that is not being used because it does not meet quality assurance standards or has been contaminated in some way that would make it unusable in a safe and medical capacity.
- Infused manufactured products that do not pass Elevation Green LLC's quality assurance testing or the California cannabis testing requirements and cannot be remediated will be rendered into cannabis waste

## CANNABIS WASTE PROCESSING AND STORAGE

Elevation Green LLC's intention is to ensure that litter and waste are properly removed from the building and the operating systems implemented for waste disposal are maintained in an adequate and secure manner. This is done to prevent them from constituting a source of contamination in areas where cannabis or cannabis products are exposed. All waste will be centralized in an enclosed container within Unit B as shown on the Premises Map.

Waste shall be disposed of utilizing standardized processes to minimize the development of odor and reduce the potential for the waste becoming an attractant, harborage, or breeding place for pests. Plant waste ("Green Waste"), which is defined as all cannabis debris and includes dead plants, roots, stems and fan leaves, and all otherwise unused or surplus plant parts, will be weighed and recorded within the Elevation Green LLC's inventory system. Identification batch numbers, individual weight amounts, types of cannabis, and the time and date of disposal or destruction will be recorded on hard copy log forms and manually input into the Track and Trace system (currently METRC).

Employees will wear required Personal Protective Equipment (PPE) while conducting cannabis waste disposal or destruction practices. Cannabis waste will be made unusable and

unrecognizable. Cannabis waste shall be broken down if in large pieces, and then mixed with 50% non-consumable solid waste, in order to achieve an unusable, unrecognizable, and non-retrievable substance. Once cannabis waste is made unusable and unrecognizable, the rendered substance will be safely stored in the Secured Waste Storage area prior to disposal.

Elevation Green LLC will utilize an internal track and trace system to ensure its post-processing and post-manufacturing waste materials are identified, weighed, and tracked and logged appropriately prior to entering the information METRC. Cannabis waste will be weighed before leaving any work area for disposal. Elevation Green LLC will maintain accurate and comprehensive records regarding any waste material produced through the trimming or pruning of a cannabis manufacturing, which will include weighing and documenting waste. Waste, whether produced prior or subsequent to manufacturing, will be disposed of in accordance with this Waste Management Plan and be made unusable and unrecognizable per Elevation Green LLC's organizational SOPs. All waste records will be thoroughly kept and available on site for inspection.

## WEIGHTS AND MEASURES

Weighing devices used by Elevation Green LLC shall be approved, tested, and sealed in accordance with the requirements in Chapter 5 (commencing with section 12500) of Division 5 of the Business and Professions Code, and registered with the county sealer consistent with Chapter 2 (commencing with section 12240) of Division 5 of the Business and Professions Code. Approved and registered devices shall be used whenever:

- Cannabis or cannabis product is bought or sold by weight or count;
- Cannabis or cannabis product is packaged for sale by weight or count;
- Cannabis or cannabis product is weighed or counted for entry into the track-and-trace system, including entry as cannabis waste; and
- The weighing device is used for commercial purposes as defined in section 12500 of the Business and Professions Code.

For the purposes of this section, "count" means the numerical count of the individual cannabis product units. Whenever Elevation Green LLC is determining the weight, measure, or count of cannabis and cannabis products for the purposes specified above, the weight, measure, or count shall be determined by a licensed weighmaster as required by Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code. The weighmaster certificate required under section 12711 of the Business and Professions Code shall not be required when cannabis or cannabis products are weighed.

## WASTE DISPOSAL METHODS

Cannabis waste generated on the premises as part of the Microbusiness operations, including cultivation, manufacturing, and distribution, shall be processed into unusable, unrecognizable,

## WASTE MANAGEMENT PLAN

and non-retrievable substances prior to storage and disposal. Cannabis waste, once processed, is then considered standard waste and shall be disposed of either through waste disposal services provided at the premises or by self-hauling to one of the following:

- A manned and fully permitted solid-waste landfill or transformation facility; or
- A manned and fully permitted transfer/processing facility or manned transfer/processing operation.

Facilities that Elevation Green LLC will self-haul processed cannabis waste to include:

- Mammoth Lakes Transfer Station at 59 Commerce Drive, Mammoth Lakes, California;
- Benton Crossing Landfill on Benton Crossing Road (while still operational);
- Pumice Valley Landfill/Transfer Station on Hwy 120 East; or
- Paradise Transfer Station off of Lower Rock Creek Road

Elevation Green LLC will ensure that non-cannabis waste and litter are properly stored and removed to ensure waste disposal is maintained in an adequate manner so as to not constitute a source of contamination to cannabis or cannabis products.

# INTEGRATED PEST MANAGEMENT PLAN

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This Integrated Pest Management Plan has been developed for Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Integrated Pest Management Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for safe and secure management of pests for the cultivation operations. Methods used to manage pests include: cultural, mechanical, biological, and chemical. Preventative methods are preferred to control pests, however biological or chemical methods may be necessary to manage pests.

## PEST MANAGENT MEASURES

### PREVENTION

Elevation Green LLC will use preventative methods to manage and control pests by being familiar with the crop, the pests associated and potential management and control options in case they are needed. These methods include:

- Knowing and recognizing the development stage of the crop
- Recognizing the organisms that jeopardize the crop
- Familiarity with the stage at which pests pose a challenge and monitoring for it

### MONITORING

Elevation Green LLC shall record any pests seen and under what conditions they are present. The monitoring techniques shall be validated so that the thresholds correspond to an actual risk to the plants. The information shall be recorded on data sheets, where numbers of pests can be tallied and compared to thresholds.

### DECISION MAKING

Once familiar with thresholds, critical periods, and models to forecast diseases before monitoring for them. Biological control management methods may be considered for use in the system that can be expected to resolve the problem. If biological control methods have proven ineffective through experience or research, chemical management methods may be utilized to manage the pests.

### IMPLEMENT SOLUTION

Elevation Green LLC shall implement whichever pest management method is deemed necessary by following the procedures on the label of all pest control products used, the rates approved for its use, and the number of applications per season allowed, pre-harvest and reentry intervals.

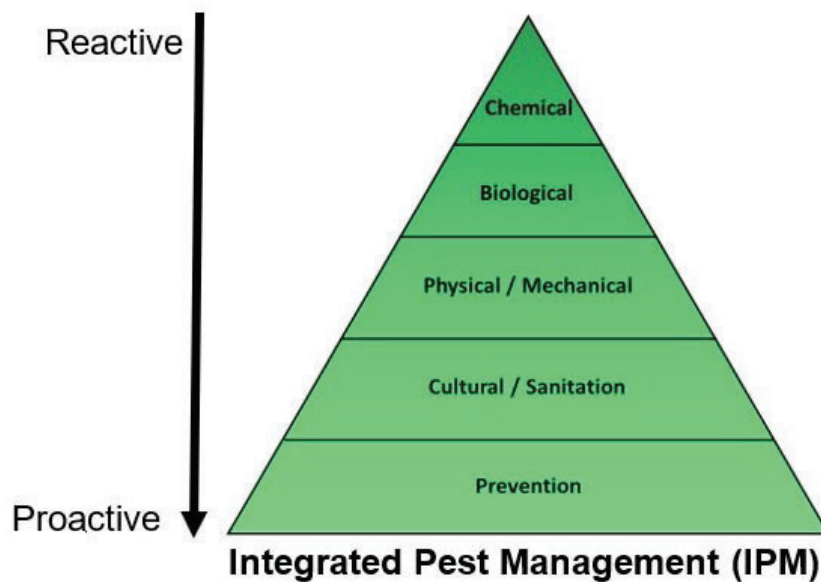


### ASSESS EFFECTIVENESS

Assessing the effectiveness of solutions used will allow Elevation Green LLC to assess risks such as development of resistance, calibration issues, or perhaps plan for changed cultural practices for the next crop such as changing varieties.

### METHODS TO MANAGE PESTS

FIGURE 1: INTEGRATED PEST MANAGEMENT METHODS



### CULTURAL PEST-MANAGEMENT CONTROL METHODS

Elevation Green LLC will prioritize the use of cultural management methods to help manage pests. These include irrigation practices, sanitation, and managing how personnel interact in the work environment. Cleanliness in all operational aspects is Elevation Green LLC's top priority. Ensuring owners or employees are clean and wearing protective clothing while working in the facility will minimize the potential for inadvertent introduction of pests or other contaminants from the external environments.

### MECHANICAL AND STRUCTURAL PEST-MANAGEMENT CONTROL METHODS

Elevation Green LLC's premises has been designed to separate different operational aspects of the business, not only for efficiency, but also to easily control the operational environments. Cultivation operations shall be focused in Unit A, while Manufacturing and Distribution shall occur in Unit B. The environmental control and watering systems are also set up to allow for environmental isolation of each room that is part of the cultivation operations. Therefore, if a pest problem jeopardizes one part of the operation, it can easily be contained in that area and managed as to not impact the entire cultivation operation. This is also true for the other operations at the premises, Manufacturing and Distribution. Those operations are focused in

different areas and shall have their own cleaning protocols to prevent the introduction of pests and contaminants during those operations.

### BIOLOGICAL AND CHEMICAL PEST-MANAGEMENT CONTROL METHODS

Elevation Green LLC shall utilize biological and chemical pest management products approved for indoor cannabis cultivation use by the California Department of Pesticide Regulation. Table 1 includes all biological and chemical ingredients that may be utilized for pest-management controls. Biological controls utilize natural predators, parasites, pest diseases and other organisms to counter the effects of pests or to prevent them altogether. Beneficial fungi and microbes inoculated into the soil increase nutrient uptake and the plant's disease resistance. For example predatory nematodes can be released into the soil to kill larvae of thrips and other insects that lay their eggs in soil. Biological controls use nature to combat nature. Biological pest-management methods may be applied and depends on the Elevation Green LLC shall follow the procedures on the label of all chemical pest control products used, the rates approved for its use, the number of applications per season allowed, pre-harvest and reentry intervals. All owners and employees shall be trained and utilize the proper Personal Protective Equipment (PPE) for the type of chemical pest management method to be applied.

**TABLE 1: CHEMICAL(S) & BIOLOGICAL METHODS TO BE APPLIED**

The active ingredients listed in this table are exempt from residue tolerance requirements and are either exempt from registration requirements or registered for a use broad enough to include use on cannabis. [California Department of Pesticide Regulation, last updated on September 22, 2017]

ACTIVE INGREDIENT	PEST OR DISEASE
azadirachtin	aphids, whiteflies, fungus gnats, leafminers, cutworms
<i>Bacillus amyloliquefaciens</i> strain D747	root and crown diseases, powdery mildew, Botrytis
<i>Bacillus subtilis</i> QST	root diseases, powdery mildew
<i>Bacillus thuringiensis</i> subsp. <i>kurstaki</i>	moth larvae (e.g., cutworms, budworms, borers)
<i>Bacillus thuringiensis</i> subsp. <i>israelensis</i>	fly larvae (e.g., fungus gnats)
<i>Beauveria bassiana</i>	whiteflies, aphids, thrips
<i>Burkholderia</i> spp. strain A396	mites, leafhoppers, aphids, whiteflies, thrips, moth larvae
capsaicin (= capsicum oleoresin)	repellent (insects + vertebrates); mites, leafhoppers, whiteflies, thrips, moth larvae
castor oil	repellent (moles, voles, gophers)
cinnamon, cinnamon oil	slugs and snails, mites, leafhoppers, aphids, whiteflies, moth larvae
citric acid	bacteria, fungi, mites, insects
cloves and clove oil	bacteria, fungi
corn oil	fungi, mites, insects
cottonseed oil	fungi, mites, insects
garlic and garlic oil	mites, leafhoppers, aphids, whiteflies, moth larvae
geraniol	fungi, rodent repellent, mites, insects

# INTEGRATED PEST MANAGEMENT PLAN

ACTIVE INGREDIENT	PEST OR DISEASE
<i>Gliricladium virens</i>	root diseases
horticultural oils (petroleum oil)	mites, aphids, whiteflies, thrips, powdery mildew
insecticidal soaps (potassium salts of fatty acids)	aphids, whiteflies, cutworms, budworms
iron phosphatase, sodium ferric EDTA	slugs and snails
<i>Isaria fumosorosea</i>	mites, aphids, whiteflies, thrips
neem oil	mites, powdery mildew
peppermint, peppermint oil	bacteria, fungi, mites, leafhoppers, aphids, whiteflies, moth larvae
potassium bicarbonate; sodium bicarbonate	powdery mildew
potassium silicate	powdery mildew, mites, aphids
potassium sorbate	fungi, mites, insects
predatory nematodes	fungus gnats
putrescent whole egg solids	squirrel, rabbit, and deer repellent
rosemary, rosemary oil	bacteria, fungi, leafhoppers, aphids, whiteflies, moth larvae
sesame and sesame oil	mites, leafhoppers, aphids, whiteflies, moth larvae
sodium chloride	[minor active ingredient in some fungicide and insecticide formulations]
soybean oil	mites, insects
Reynoutria sachalinensis extract	powdery mildew
sulfur	mites, flea beetles
<i>Trichoderma harzianum</i>	root diseases
thyme oil	mites, leafhoppers, aphids, whiteflies, moth larvae

**TABLE 2: EXAMPLE PEST MANAGEMENT PRACTICES FOR INDOOR CULTIVATION**

Table 2 outlines examples of integrated pest management practices for indoor cultivation from the California Department of Pesticide Regulation, October 9, 2017]

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
<b>DISEASES</b>			
<b>powdery mildew</b> <i>Sphaerotheca macularis</i>	Grow on <b>leaves</b> as white and gray powdery patches	<ul style="list-style-type: none"> <li>Use fans to improve air circulation</li> </ul>	horticultural oil; neem oil; sodium bicarbonate, potassium bicarbonate; <i>Bacillus subtilis</i>
<b>pythium root rots</b> <i>Pythium</i> spp.	Attack root tips and worsens when plants grow in wet soil	<ul style="list-style-type: none"> <li>Avoid hydroponic production or wet soil conditions</li> </ul>	Incorporate biocontrol agents into root-growing media (e.g., <i>Gliricladium virens</i> , <i>Trichoderma harzianum</i> , <i>Bacillus subtilis</i> )

# INTEGRATED PEST MANAGEMENT PLAN

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
MITES & INSECTS			
<b>two-spotted spider mites</b> <i>Tetranychus urticae</i> (and other Tetranychidae)	Suck plant sap; stipple <b>leaves</b>	<ul style="list-style-type: none"> <li>Disinfest cuttings before introducing to growing area</li> <li>Release predatory mites (<i>Amblyseius</i> spp., <i>Phytoseiulus persimilis</i>), or lacewings (<i>Chrysoperia</i> spp.)</li> </ul>	neem oil, horticultural oil, sulfur
<b>broad mites</b>	Distort <b>leaves</b> and <b>buds</b>	<ul style="list-style-type: none"> <li>Inspect plants; disinfest or dispose of infested plants</li> <li>Release predatory mites (<i>Amblyseius</i> spp.) and six-spotted thrips</li> </ul>	
<b>leafhoppers</b>	Suck plant sap; weaken plants	<ul style="list-style-type: none"> <li>Encourage natural enemies by planting nectar sources</li> </ul>	horticultural oil or insecticidal soaps for nymphs
<b>whiteflies</b> <i>Trialeurodes vaporariorum</i> , <i>Bemisia tabaci</i> , <i>B. argentifolii</i>	Suck plant sap; weaken plants	<ul style="list-style-type: none"> <li>Hang up yellow sticky cards</li> <li>Use biocontrol: <i>Amblyseius swirskii</i>, <i>Encarsia formosa</i>, <i>Delphastus catalinae</i>, <i>Steinernema feltiae</i></li> </ul>	azadirachtin, <i>Beauveria bassiana</i> , cinnamon oil, horticultural oil
<b>thrips</b> <i>Heliothrips haemorrhoidalis</i> , <i>Frankliniella occidentalis</i> , <i>Thrips tabaci</i>	Stipple and scar <b>leaves</b> ; vector viruses	<ul style="list-style-type: none"> <li>Sterilize soil and pots before growing</li> <li>Hang up yellow or blue sticky cards</li> <li>Use biocontrol <i>Stratiolaelaps scimitus</i>, <i>Amblyseius cucumeris</i>, <i>Amblyseius swirskii</i>, <i>Orius insidiosus</i></li> </ul>	azadirachtin, horticultural oil, insecticidal soaps, rosemary + peppermint oils, <i>Beauveria bassiana</i>
<b>rice root aphid</b> <i>Rhopalosiphum rufiabdominalis</i>	Feed on roots; stunt and weaken plants	<ul style="list-style-type: none"> <li>Dispose of weakened infested plants</li> <li>Mix in sharp soil amendments such as diatomaceous earth</li> <li>Use biocontrol: <i>Stratiolaelaps scimitus</i>, <i>Dalotia coriaria</i>, <i>Steinernema feltiae</i></li> </ul>	<i>Beauveria bassiana</i>
<b>dark-winged fungus gnats</b> (Diptera: Sciaridae) <i>Bradysia</i> spp.	Damage <b>roots</b> and stunt plant growth	<ul style="list-style-type: none"> <li>Avoid overwatering</li> <li>Use growing media that deters gnat development</li> <li>Hang up yellow sticky cards</li> <li>Use biocontrol: <i>Stratiolaelaps scimitus</i>, <i>Dalotia coriaria</i>, <i>Steinernema feltiae</i></li> </ul>	<i>Bacillus thuringiensis israelensis</i> (BTI); predatory nematodes; azadirachtin soil drenches

# FERTILIZER MANAGEMENT PLAN

This Fertilizer Management Plan has been developed for the Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Fertilizer Management Plan describes the products, product specifications, storage, and usage for Elevation Green LLC's cultivation operations.

## FERTILIZER PRODUCTS

Fertilizer products to be utilized for cultivation operations are from Athena Products, Inc., a company registered with the California Department of Food and Agriculture (CDFA) Fertilizing Materials Program which is part of the Feed, Fertilizer, & Livestock Drug Regulatory Services Branch. The Athena Products, Inc. specialty fertilizers proposed for use are all registered and approved under CDFA Fertilizing Materials License number 678408.

## FERTILIZER STORAGE

All fertilizer shall be stored in the Fertilizer Storage Area as shown on Elevation Green LLC's Premises Map in accordance with the manufacturer's guidelines.

## FERTILIZER USE

Fertilizer products will be mixed by hand in amounts sufficient for each scheduled feeding. The mixed fertilizer will then be applied to the growth medium for clones, mother plants, immature cannabis plants, and mature/flowering cannabis. All fertilizer will be mixed and applied in accordance with the manufacturer's guidelines for the specific product.

TABLE 1: FERTILIZER LIST

Firm Name	Product Name	Product Type	CDFA Registration Status
ATHENA PRODUCTS INC	<a href="#">PRO CORE 14-0-0</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">PRO GROW 2-8-20</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">PRO BLOOM 0-12-24</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">STACK 0-0-1</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">PK 0-4-5</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">CA MG 2-0-0</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">GROW B 1-3-5</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">GROW A 4-0-1</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">BLOOM B 0.7-6-5</a>	Specialty Fertilizer	Approved
ATHENA PRODUCTS INC	<a href="#">BLOOM A 4-0-5</a>	Specialty Fertilizer	Approved
Individual fertilizer product information is included below.			





Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	PRO CORE 14-0-0
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	703588
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	14
Available Phosphoric Acid (P2O5)	
Soluble Potash (K2O)	
<b>Secondary Nutrient</b>	
Calcium (Ca)	17
Magnesium (Mg)	
Sulfur (S)	

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	0.015
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	0.01
Iron (Fe)	0.1
Manganese (Mn)	0.04
Molybdenum (Mo)	0.01
Sodium (Na)	
Zinc (Zn)	0.013

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	BDL
Cadmium (Cd)	BDL
Cobalt (Co)	BDL
Copper (Cu)	= 9.61
Lead (Pb)	BDL
Mercury (Hg)	BDL
Molybdenum (Mo)	= 1.09
Nickel (Ni)	BDL
Selenium (Se)	= 4.44

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	PRO GROW 2-8-20
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	697653
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	2
Available Phosphoric Acid (P2O5)	8
Soluble Potash (K2O)	20
<b>Secondary Nutrient</b>	
Calcium (Ca)	
Magnesium (Mg)	3
Sulfur (S)	8

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	0.1
Manganese (Mn)	
Molybdenum (Mo)	0.001
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	ND
Cadmium (Cd)	ND
Cobalt (Co)	ND
Copper (Cu)	= 186
Lead (Pb)	ND
Mercury (Hg)	ND
Molybdenum (Mo)	= 16.1
Nickel (Ni)	ND
Selenium (Se)	ND

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	PRO BLOOM 0-12-24
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	697651
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	0
Available Phosphoric Acid (P2O5)	12
Soluble Potash (K2O)	24
<b>Secondary Nutrient</b>	
Calcium (Ca)	
Magnesium (Mg)	3
Sulfur (S)	9

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	0.1
Manganese (Mn)	
Molybdenum (Mo)	0.004
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	ND
Cadmium (Cd)	ND
Cobalt (Co)	ND
Copper (Cu)	= 315
Lead (Pb)	= 0.626
Mercury (Hg)	ND
Molybdenum (Mo)	= 43
Nickel (Ni)	ND
Selenium (Se)	ND

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	STACK 0-0-1
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	697648
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	0
Available Phosphoric Acid (P2O5)	
Soluble Potash (K2O)	1
<b>Secondary Nutrient</b>	
Calcium (Ca)	
Magnesium (Mg)	
Sulfur (S)	

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	
Manganese (Mn)	
Molybdenum (Mo)	
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	ND
Cadmium (Cd)	ND
Cobalt (Co)	ND
Copper (Cu)	= 1.2
Lead (Pb)	ND
Mercury (Hg)	ND
Molybdenum (Mo)	ND
Nickel (Ni)	ND
Selenium (Se)	ND

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	PK 0-4-5
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679157
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	0
Available Phosphoric Acid (P2O5)	4
Soluble Potash (K2O)	5
<b>Secondary Nutrient</b>	
Calcium (Ca)	
Magnesium (Mg)	0.96
Sulfur (S)	1.5

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	
Manganese (Mn)	
Molybdenum (Mo)	
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	< 0.048
Cadmium (Cd)	= 0.01
Cobalt (Co)	< 0.048
Copper (Cu)	< 0.048
Lead (Pb)	< 0.1
Mercury (Hg)	< 0.01
Molybdenum (Mo)	< 0.048
Nickel (Ni)	= 0.05
Selenium (Se)	< 0.048

**Legend:**

BDL - Below Detection Level

ND - None Detected





Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	CA MG 2-0-0
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679156
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	2
Available Phosphoric Acid (P2O5)	
Soluble Potash (K2O)	
<b>Secondary Nutrient</b>	
Calcium (Ca)	2.1
Magnesium (Mg)	1.1
Sulfur (S)	

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	0.06
Manganese (Mn)	
Molybdenum (Mo)	
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	< 0.049
Cadmium (Cd)	= 0.01
Cobalt (Co)	< 0.049
Copper (Cu)	= 0.06
Lead (Pb)	< 0.1
Mercury (Hg)	< 0.01
Molybdenum (Mo)	< 0.049
Nickel (Ni)	= 0.06
Selenium (Se)	= 0.11

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	GROW B 1-3-5
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679155
<b>Status</b>	Approved

Guaranteed Analysis(%)	
Primary Nutrient	
Total Nitrogen (N)	1
Available Phosphoric Acid (P2O5)	3
Soluble Potash (K2O)	5
Secondary Nutrient	
Calcium (Ca)	
Magnesium (Mg)	0.89
Sulfur (S)	1.3

Guaranteed Analysis(%)	
Micro Nutrient	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	0.005
Iron (Fe)	
Manganese (Mn)	
Molybdenum (Mo)	
Sodium (Na)	
Zinc (Zn)	

Heavy Metals (ppm)	
Analysis	
Arsenic (As)	< 0.049
Cadmium (Cd)	= 0.02
Cobalt (Co)	< 0.049
Copper (Cu)	= 30.2
Lead (Pb)	< 0.1
Mercury (Hg)	< 0.01
Molybdenum (Mo)	= 0.06
Nickel (Ni)	< 0.049
Selenium (Se)	< 0.049

**Legend:**

BDL - Below Detection Level

ND - None Detected



# Feed, Fertilizer and Livestock Drugs Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	GROW A 4-0-1
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679153
<b>Status</b>	Approved

Guaranteed Analysis(%)	
Primary Nutrient	
Total Nitrogen (N)	4
Available Phosphoric Acid (P2O5)	
Soluble Potash (K2O)	1
Secondary Nutrient	
Calcium (Ca)	4.2
Magnesium (Mg)	0.19
Sulfur (S)	

Guaranteed Analysis(%)	
Micro Nutrient	
Boron (B)	0.01
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	0.06
Manganese (Mn)	0.013
Molybdenum (Mo)	0.0007
Sodium (Na)	
Zinc (Zn)	0.0045

Heavy Metals (ppm)	
Analysis	
Arsenic (As)	< 0.049
Cadmium (Cd)	< 0.00486
Cobalt (Co)	= 0.05
Copper (Cu)	= 0.6
Lead (Pb)	= 0.45
Mercury (Hg)	< 0.01
Molybdenum (Mo)	= 6.3
Nickel (Ni)	= 0.06
Selenium (Se)	= 0.12

## Legend:

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	BLOOM B 0.7-6-5
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679149
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	0.7
Available Phosphoric Acid (P2O5)	6
Soluble Potash (K2O)	5
<b>Secondary Nutrient</b>	
Calcium (Ca)	
Magnesium (Mg)	0.94
Sulfur (S)	1.3

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	0.005
Iron (Fe)	
Manganese (Mn)	
Molybdenum (Mo)	
Sodium (Na)	
Zinc (Zn)	

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	= 0.34
Cadmium (Cd)	= 0.01
Cobalt (Co)	< 0.049
Copper (Cu)	= 38.3
Lead (Pb)	< 0.1
Mercury (Hg)	< 0.01
Molybdenum (Mo)	= 0.06
Nickel (Ni)	= 0.06
Selenium (Se)	< 0.049

**Legend:**

BDL - Below Detection Level

ND - None Detected



Feed, Fertilizer and Livestock Drugs  
Regulatory Services Division of Inspection Services

<b>Firm Name</b>	ATHENA PRODUCTS INC
<b>License ID #</b>	678408
<b>Product Name</b>	BLOOM A 4-0-5
<b>Type of Fertilizing Material</b>	Specialty Fertilizer
<b>Is this an Organic Input Material (OIM)?</b>	No
<b>Annotation</b>	

<b>Registration ID#</b>	679146
<b>Status</b>	Approved

<b>Guaranteed Analysis(%)</b>	
<b>Primary Nutrient</b>	
Total Nitrogen (N)	4
Available Phosphoric Acid (P2O5)	
Soluble Potash (K2O)	5
<b>Secondary Nutrient</b>	
Calcium (Ca)	3.2
Magnesium (Mg)	0.17
Sulfur (S)	

<b>Guaranteed Analysis(%)</b>	
<b>Micro Nutrient</b>	
Boron (B)	0.01
Chlorine (Cl)	
Cobalt (Co)	
Copper (Cu)	
Iron (Fe)	0.06
Manganese (Mn)	0.013
Molybdenum (Mo)	0.0007
Sodium (Na)	
Zinc (Zn)	0.0045

<b>Heavy Metals (ppm)</b>	
<b>Analysis</b>	
Arsenic (As)	< 0.049
Cadmium (Cd)	< 0.00489
Cobalt (Co)	= 0.05
Copper (Cu)	= 0.07
Lead (Pb)	< 0.1
Mercury (Hg)	< 0.01
Molybdenum (Mo)	= 4.98
Nickel (Ni)	= 0.05
Selenium (Se)	= 0.11

**Legend:**

BDL - Below Detection Level

ND - None Detected



# PACKAGING AND LABELING PLAN

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## GENERAL OVERVIEW

This Packaging and Labeling Plan has been developed for Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Packaging and Labeling Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for safe and secure packaging and labeling operations. Packaging and Labeling policies and procedures will be compliant with the regulations set forth by the Commercial Cannabis licensing authorities, the Bureau of Cannabis Control (BCC) the Town of Mammoth Lakes (TOML), California Department of Public Health (CDPH), the California Department of Food and Agriculture (CDFA), or any other State commercial cannabis licensing authority ("Licensing Agencies") and all applicable state and local laws, regulations, ordinances, and other requirements relevant to the business operations for commercial cannabis goods.

## PACKAGING

A package used to contain cannabis or a cannabis product shall comply with the following requirements:

- The package shall protect the product from contamination and shall not expose the product to any toxic or harmful substance.
- The package shall be tamper-evident, which means that the product packaging is sealed so that the contents cannot be opened without obvious destruction of the seal.
- If the product has multiple uses, the package shall be resealable.
- The package shall not imitate any package used for products typically marketed to children.
- If the product is an edible product, the package shall be opaque. Amber bottles shall be considered opaque for purposes of this section.
- Opaque bottles used to contain a cannabis beverage product may utilize a single, vertical, clear strip of no wider than 0.25 inches for the purpose of determining serving amounts.
- The package shall be child-resistant, as described in below.

## CHILD RESISTENT PACKAGING REQUIREMENTS

- A package containing cannabis or cannabis products packaged for retail sale shall be child-resistant, as follows:
  - An edible product, an orally-consumed concentrate, or a suppository shall be child-resistant for the life of the product. A package that contains more than a single serving is not required to be child-resistant if each individual serving is packaged in child-resistant packaging.
  - Cannabis or a cannabis product intended to be inhaled or a cannabis product that is applied topically may utilize packaging that is child-resistant only until first

opened, if the package is labeled with the statement “This package is not child-resistant after opening.”

- The following packages are considered child-resistant for purposes of this Article:
  - Any package that has been certified as child-resistant under the requirements of the Poison Prevention Packaging Act of 1970 Regulations (16 C.F.R. §1700.15(b)(1)) (Rev. July 1995), which is hereby incorporated by reference.
  - A bottle sealed with a pry-off metal crown cork style bottle cap, provided that the bottle contains only a single serving.
  - Plastic packaging that is at least 4 mils thick and heat-sealed without an easy-open tab, dimple, corner, or flap, provided that the package contains a cannabis product described above or is a cannabis product that is only a single serving.

## WEIGHTS AND MEASURES

Weighing devices used by Elevation Green LLC shall be approved, tested, and sealed in accordance with the requirements in Chapter 5 (commencing with section 12500) of Division 5 of the Business and Professions Code, and registered with the county sealer consistent with Chapter 2 (commencing with section 12240) of Division 5 of the Business and Professions Code. Approved and registered devices shall be used whenever:

- Cannabis or cannabis product is bought or sold by weight or count;
- Cannabis or cannabis product is packaged for sale by weight or count;
- Cannabis or cannabis product is weighed or counted for entry into the track-and-trace system; and
- The weighing device is used for commercial purposes as defined in section 12500 of the Business and Professions Code.

For the purposes of this section, “count” means the numerical count of the individual cannabis product units. Whenever Elevation Green LLC is determining the weight, measure, or count of cannabis and cannabis products for the purposes specified above, the weight, measure, or count shall be determined by a licensed weighmaster as required by Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code. The weighmaster certificate required under section 12711 of the Business and Professions Code shall not be required when cannabis or cannabis products are weighed.

## LABELING

### LABELING

Labeling standards shall be applied to all cannabis goods that Elevation Green LLC labels. These standards shall also be verified for any cannabis goods that Elevation Green LLC receives from another licensee. The labeling requirements for pre-rolls or packaged flower, manufactured goods, or edibles are described in the sections below. All labels shall be inspected for quality assurance/quality control of the tested product:

- The Certificate of Analysis (COA) from a licensed testing facility is less than 12 months old; and
- The label includes:
  - Cannabinoids, terpenoids, total THC and/or CBD
    - THC/CBD amount shall be within  $\pm 10\%$  of that listed on the label
    - Terpenoid amount shall be within  $\pm 10\%$  of that listed on the label
  - Cannabis goods have not exceeded their sell-by date
  - Weight or count of the batch matches that in the Track and Trace system
  - UID of the batch matches that in the Track and Trace system
- All Events prior to receiving the final COA are recorded in the Track and Trace system

#### LABELING REQUIREMENTS: PRE-ROLLS AND PACKAGED FLOWER

- The label for a package of pre-rolls or packaged flower shall include a primary panel that includes the following information in a type size no less than 6 point font and in relation to the size of the primary panel and container:
  - Identity of the product;
  - The net weight of cannabis in the package, listed in both metric and U.S. customary units; and
  - Universal symbol, as prescribed in Section 40412 of the CDPH Cannabis Regulations.
- The label for a package of pre-rolls or packaged flower shall include an informational label that includes the following information in a type size no less than 6 point font and in relation to the size of the informational panel and container:
  - The UID;
  - The licensed cultivator or licensee packaging the product (either the legal business name or the registered name under which the business will operate listed on the license certificate), and its contact number or website address;
  - The date of packaging for retail sale;
  - The following statement in bold print: "GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION."
- Additional information may be included on the label, provided that the label does not violate the requirements of the Licensing Agencies.
- The cannabinoid content for a package of pre-rolls or packaged flower shall be labeled as specified below under the Cannabinoid Content Labeling section.

#### PRIMARY PANEL LABELING REQUIREMENTS: MANUFACTURED PRODUCTS

- The label for a manufactured cannabis product shall include a primary panel that includes the following information in a type size no less than 6 point font and in relation to the size of the primary panel and container:

- The identity of the product in a text size reasonably related to the most prominent printed matter on the panel;
- Universal symbol, as prescribed in Section 40412 of the CDPH Cannabis Regulations.
- The net weight or volume of the contents of the package, listed in both metric and U.S. customary units.
- Cannabinoid content may be included on the primary panel. Cannabinoid content for manufactured cannabis products shall be labeled as specified below under the Cannabinoid Content Labeling section.
- Additional information may be included on the label, provided that the label does not violate the requirements of the Licensing Agencies.

#### ADDITIONAL PRIMARY PANEL LABELING REQUIREMENTS: EDIBLE PRODUCTS

In addition to the requirements listed above, the primary panel of an edible cannabis product shall include the words “cannabis-infused” immediately above the identity of the product in bold type and a text size larger than the text size used for the identity of the product.

#### INFORMATION PANEL LABELING REQUIREMENTS

- The label for a manufactured cannabis product shall include an informational panel that includes the following:
  - The name of the licensed manufacturer (either the legal business name or the registered name under which the business will operate listed on the license certificate) that manufactured the cannabis product and its contact number or website address;
  - The date of the cannabis product’s manufacture and packaging;
  - The following statement in bold print: “GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION.”
  - The statement “FOR MEDICAL USE ONLY,” if:
    - The cannabis product is intended by the manufacturer only for sale to medicinal-use customers;
    - The product is an orally-dissolving edible product containing more than 100 milligrams THC per package, as specified in Section 40315(b) of the CDPH Cannabis Regulations; or
    - The product is a topical cannabis product or concentrate containing more than 1,000 milligrams THC per package, as specified in Section 40315(d) of the CDPH Cannabis Regulations.

- A list of all product ingredients in descending order of predominance by weight or volume. If any product ingredient contains subingredients, the list shall either:
  - Include the common name of the ingredient followed by a parenthetical listing of all ingredients in descending order by weight or volume; or
  - List all subingredients as individual ingredients in descending order of predominance.
  - This paragraph shall not apply to flavoring, which shall instead be compliant with the requirement of 21 C.F.R. 101.22 (Rev. Jan 2009), hereby incorporated by reference.
- If the cannabis product contains an ingredient, flavoring, coloring, or an incidental additive that bears or contains a major food allergen, the word “contains,” followed by a list of the applicable major food allergens;
- The names of any artificial colorings contained in the product;
- If an edible cannabis product, the amount, in grams or milligrams, of sodium, sugar, carbohydrates, and total fat per serving;
- Instructions for use, such as the method of consumption or application, and any preparation necessary prior to use;
- The product expiration date, “use by” date, or “best by” date, if any;
- The UID and the batch or lot number; and
- If the cannabis product is perishable or is perishable after opening, the statement, “KEEP REFRIGERATED” or “REFRIGERATE AFTER OPENING,” as applicable. Elevation Green LLC does not intend to manufacture perishable cannabis goods.
- The informational panel text shall be in a text size of no less than 6 point font and in relation to the size of the primary panel and container.
- Cannabinoid content may be included on the informational panel. Cannabinoid content for manufactured cannabis products shall be labeled as specified below in the Cannabinoid Content Labeling section.
- Nothing in this section prohibits the inclusion of additional information on the informational panel provided that the label does not violate the requirements of Section 40410 of the CDPH Manufacturing Regulations.

#### THC CONCENTRATION LIMITS

- An edible cannabis product shall not contain more than:
  - 10 milligrams THC per serving; and
  - 100 milligrams THC per package.
- A package containing an edible product that is an orally-dissolving product, such as sublingual lozenges or mouth strips, may contain up to 500 milligrams THC per package, if:
  - The cannabis product consists of discrete servings of no more than 10 milligrams THC per piece;
  - The cannabis product is labeled “FOR MEDICAL USE ONLY;” and
  - The cannabis product is only available for sale to a medicinal-use customer.

## PACKAGING AND LABELING PLAN

- A topical cannabis product or a cannabis concentrate shall not contain more than 1,000 milligrams THC per package.
- A topical cannabis product or a cannabis concentrate may contain more than 1,000 milligrams THC per package, but not more than 2,000 milligrams THC per package, if the product is labeled “FOR MEDICAL USE ONLY” and is only available for sale to a medicinal-use customer.

## CANNABINOID CONTENT LABELING

- Each package for retail sale of cannabis product, cannabis flower, or pre-rolls shall be labeled with the cannabinoid content on either the primary panel or an informational panel. Cannabinoid content may be included on the product label at the manufacturing premises prior to release to a distributor as described below or it may be added to the product at the distribution premises after issuance of the regulatory compliance testing Certificate of Analysis for the batch as described below. Cannabinoid content labeling shall include the following:
  - For an edible product or a cannabis concentrate for which the manufacturer has established serving designations, THC and CBD content, expressed in milligrams per serving and milligrams per package.
  - For a topical cannabis product or a cannabis concentrate without serving designations, THC and CBD content, expressed in milligrams per package.
  - Packages of pre-rolls or cannabis flower that do not include cannabinoids other than that naturally occurring in the plant material are not required to list cannabinoid content in milligrams. Instead, such packages shall be labeled with the cannabinoid content expressed as a percentage.
  - Packages of infused pre-rolls shall be labeled with either:
    - The cannabinoid content in milligrams; or
    - The cannabinoid content of the dried flower expressed as a percentage and the added cannabinoid content in milligrams.
- A manufacturer that includes the cannabinoid content on the product label prior to release to a distributor shall label products as specified above as appropriate to the product. For THC or CBD concentration that is less than two (2) milligrams per serving or per package, the THC or CBD may be labeled as “<2.0 mg per serving” or “<2.0 mg per package.”
- A manufacturer may arrange for cannabinoid content labeling at the distribution premises after issuance of the Certificate of Analysis in accordance with the following:
  - Each package of cannabis product in the batch shall be labeled with the cannabinoid content as specified above that is indicated on the Certificate of Analysis, as well as any other cannabinoid that is 5 percent or greater of the total cannabinoid content;
  - The manufacturer shall identify a location for the cannabinoid content label on the outer packaging of the product. The location shall be sufficient in size for the required cannabinoid content to be printed in at least 6 point font;

- The cannabinoid content label shall be affixed to the identified location on the outer packaging of the product and shall not obscure any other label information.
- Nothing in this section precludes the labeling of terpenes or additional cannabinoid content on the product, provided that such information is verified by the Certificate of Analysis.

## LABELING RESTRICTIONS

Cannabis product labeling shall not contain any of the following:

- The name of a California county, including any similar name that is likely to mislead consumers as to the origin of the product, unless one hundred percent of the cannabis contained in the product was grown in that county.
- Content that is, or is designed to be, attractive to individuals under the age of 21, including but not limited to:
  - Cartoons;
  - Any likeness to images, characters, or phrases that are popularly used to advertise to children;
  - Any imitation of candy packaging or labeling; or
  - The terms “candy” or “candies” or variants in spelling such as “kandy” or “kandeez.”
- Any information that is false or misleading.
- Any health-related statement that is untrue or misleading. Any health-related statement must be supported by the totality of publicly available scientific evidence (including evidence from well-designed studies conducted in a manner which is consistent with generally recognized scientific procedures and principles), and for which there is significant scientific agreement among experts qualified by scientific training and experience to evaluate such claims.
- If the product is an edible cannabis product, a picture of the product contained therein.
- For purposes of this section, false or misleading information includes any indication that the cannabis or cannabis product is organic, unless the National Organic Program (Section 6517 of the federal Organic Foods Production Act of 1990 (7 U.S.C. Section 6501 et seq.)) authorizes organic designation and certification for cannabis and the cannabis or cannabis product meets the requirements for such designation and certification. This includes use of the word “organic” on the labeling or variants in spelling such as “organix.”
- Any labeling in violation of Section 5040.1 of Division 42 of Title 16 of the California Code of Regulations.



# QUALITY CONTROL PLAN

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## OPERATIONS OVERVIEW

Elevation Green LLC will develop and implement a complete quality control plan that will be compliant with all the rules set forth by the Town of Mammoth Lakes, Bureau of Cannabis Control, California Department of Public Health, California Department of Food and Agriculture (“Licensing Agencies”) and all other applicable state and local laws, regulations, ordinances, and other requirements. Elevation Green LLC will develop responsible and socially conscious business practices, including but not limited to:

- Creating fully compliant and efficient operations.
- Ensuring operation practices achieve an optimum balance between economic, environmental, and social goals.
- Ensuring employment practices promote equal employment opportunity, fair compensation, and diversity.
- Ensuring all employees will be fully trained to perform their duties as assigned in a safe and efficient manner.
- Establishing comprehensive security and inventory management measures and procedures to prevent and detect diversion, loss, or theft of cannabis goods.
- Ensuring the facility is suitably sized, equipped, organized, and maintained to support the safe, clean cultivation, manufacturing, and distribution of cannabis goods.
- Implementing energy saving practices throughout the Facility.
- Implementing a thorough workplace safety program.

## STANDARD OPERATING PROCEDURES

Elevation Green LLC will develop and implement comprehensive standard operating procedures that address all components of the Microbusiness operations, Cultivation, Manufacturing, and Distribution. These procedures will be designed to hold Elevation Green LLC owners and all employees accountable for Elevation Green LLC’s operations and identify individual and collective responsibilities.

A copy of the standard operating procedures will be kept in each department. All owners will ensure their employees follow these established written procedures. Additionally, managers will be responsible for being aware of any problems which prevent compliance with these procedures and for recommending any required revisions or improvements.

## REGULATORY COMPLIANCE

Elevation Green LLC’s Microbusiness operations will be subject to the rules set forth by the Licensing Agencies and all applicable state and local laws, regulations, ordinances, and other requirements, including building, zoning, employment, safety, fire, and environmental requirements. Elevation Green LLC’s standard operating procedures will detail procedures for compliance.

## DISPLAY OF LICENSE

Elevation Green LLC will post all commercial cannabis permits and licenses in a visible, conspicuous, and prominent location on the licensed premises where it can be viewed by state and local agencies. Elevation Green LLC will not conduct commercial cannabis operations without valid licenses from the Licensing Agencies.

## QUALITY CONTROL IN BUSINESS OPERATIONS

Elevation Green LLC owners are responsible for ensuring all employees fully comply with all of Elevation Green LLC's business operations policies and procedures. The policies and procedures will, at a minimum, reflect the following quality assurance principles:

- Managing both compliant and efficient operations.
- Ensuring that all employees adhere to all Elevation Green LLC Standard Operating Procedures.
- Establishing comprehensive quality assurance measures to ensure cannabis goods maintain strength, quality, and purity as represented.
- Implementing handling procedures that prevent contamination and deterioration of cannabis goods.
- Ensuring the care, quality, and safekeeping of cannabis goods from acquisition to distribution, including preventing the deterioration of goods in Elevation Green LLC's possession.
- Ensuring adequate security measures, building security, and cannabis security.
- Facility design requirements, maintenance, and sanitation.
- Proper storage and handling of cannabis goods to ensure the quality of cannabis goods while under Elevation Green LLC's control.
- Arranging for batch sampling and testing of finished cannabis goods by a licensed testing laboratory.
- Conducting a quality assurance review to ensure that cannabis goods are properly packaged and labeled prior to distribution for retail sale of any cannabis or cannabis products.
- Maintenance of records regarding all quality control and quality assurance activities.
- Employee cleanliness standards and requirements for contamination prevention.
- Recall and withdrawal protocols.

## CONSENT TO INSPECTION

Elevation Green LLC may be subject to inspection of its premises by the local fire department, building inspector, code enforcement officer(s), or Licensing Agencies to confirm that no health or safety concerns are present, among other authorized purposes. Elevation Green LLC acknowledges that its premises may be subject to random and unannounced inspections by the Licensing Agencies. All Elevation Green LLC employees and staff will cooperate in a timely manner with the requirements of an inspection or audit.

## PERSONNEL

Elevation Green LLC's owners will conduct all operations and may need to hire employees to meet operational demands. Employees shall possess the correct skill-sets and experience needed to ensure the success of all business operations. Elevation Green LLC's employee acquisition process, procedures for assessments, terminations, and transition policies shall comply with labor standards for Agricultural Workers for cultivation operations, and other appropriate labor standards for manufacturing and distribution employees.

## ORGANIZATIONAL STRUCTURE

Elevation Green LLC will maintain an organizational chart depicting the supervisory and reporting structure of the organization. The organizational chart will be available to the Licensing Agencies and personnel at all times.

## EMPLOYMENT ELIGIBILITY

Only individuals who are qualified to perform their assigned job responsibilities are eligible for employment with Elevation Green LLC. All prospective employees must be twenty-one (21) years of age or older and comply with all other applicable requirements of the Licensing Agencies. The Human Resources Representative will ensure all employees have the required qualifications and employee background checks prior to hire, which may include fingerprinting.

## FACILITY REQUIREMENTS

Elevation Green LLC will occupy the premises and ensure the facility maintains compliance with all applicable state and local laws, regulations, building codes, ordinances, and other requirements. The Facility will be equipped with land, infrastructure, and equipment that are, at minimum, sufficient for high-quality business operations. Elevation Green LLC and its premises will conform to all relevant fire codes and local land use regulations. The Facility will be outfitted with adequate lighting, ventilation, and temperature and humidity control equipment.

## ENERGY MANAGEMENT PROGRAM

Electricity for the premises is provided by Southern California Edison. Propane is provided to the premises from a propane tank located outside, which is filled as needed. Elevation Green LLC strives to minimize its impact on the environment. As such, Elevation Green LLC shall implement energy conservation measures for improvements made to the premises. Elevation Green LLC's preferable energy management program would include, but not be limited to, utilizing:

- Automated HVAC controls.
- Automated interior and exterior lighting controls.
- Energy efficient lighting throughout the premises by utilizing energy efficient fixtures and LED lighting.
- Motion and sound detection lighting controls.
- Clean burn technology in all heating units.

- Preventative maintenance programs designed to ensure installed technology will be operating at peak performance.
- For operations that require peak energy uses, such as lighting in the cultivation flower room, these operations will be scheduled during low energy demand times of day
- Investigating energy savings that could be realized by replacing equipment or by upgrading building systems.
- Targeting and implementing opportunities to save energy.
- Tracking progress by analyzing meter data to determine if energy-saving efforts have provided savings.

## ELECTRICAL SYSTEM AND LIGHTING

Elevation Green LLC's electrical system additions shall be installed by a licensed professional and in accordance with an approved permit from the Town of Mammoth Lakes. The electrical system will have sufficient capacity to handle the actual electrical load. All electrical work and upgrades at the premises will be performed with proper permitting and be connected to the electrical system in accordance with the equipment manufacturer's recommendations.

There will be proper and safe lighting in all areas where cannabis goods will be stored and handled. Adequate lighting will also be provided in handwashing areas, toilet facilities, and any dressing or locker rooms. All electric circuits, panels, and disconnect switches will be easily accessible and clearly marked.

Elevation Green LLC will ensure that the electrical system and lighting comply with all applicable state and local laws, regulations, ordinances, and other requirements, will be maintained in good repair, and will not present an electrical shock or fire hazard.

## WATER MANAGEMENT

Elevation Green LLC's plumbing system additions will be installed by a licensed professional, and will be sufficient to meet the demands of Elevation Green LLC's planned operations, including personal consumption. The Elevation Green LLC premises is connected to the Mammoth Community Water District's municipal water and sewer system. Elevation Green LLC will comply with all applicable International Plumbing Codes (IPC) regarding the installation, alteration, repair, relocation, replacement, addition to, or use or maintenance of plumbing systems within the premises. Low-flow fixtures and efficient equipment shall be installed and used to reduce water consumption. More details on water use in cultivation and manufacturing operations can be found in the Cultivation Plan and Manufacturing Plan.

## SEWAGE DISPOSAL

The sewage system shall be maintained and kept in good repair so that it does not pose a potential source of contamination to cannabis products, contact surfaces, or packaging materials. Elevation Green LLC's premises is connected to municipal sewage service through the Mammoth Community Water District.

## TOILET FACILITIES

Adequate, readily accessible toilet facilities will be available to employees. Toilet facilities will be maintained in a sanitary condition. A daily walk-through shall be completed to ensure

toilets, hot running water, toilet paper, disposable towels, and soap will be available at the premises. Regular maintenance will be scheduled to ensure toilet facilities will be maintained in a clean and functioning condition.

#### HANDWASHING FACILITIES

Easily accessible handwashing facilities with warm running water will be located in all toilet facilities. Instructive handwashing signage will be displayed at all handwashing facilities and may be posted in multiple languages, as needed.

#### COMMERCIAL WASHING FACILITIES

Commercial food-grade washing facilities are located on the Elevation Green LLC premises as shown on the Premises Map for proper cleaning of manufacturing equipment and utensils.

#### JANITORIAL WASHING FACILITIES

Janitorial washing facilities are located at the Elevation Green LLC premises for janitorial uses. These facilities are separate than the other washing facilities used for hand washing and manufacturing equipment washing.

#### WATER QUALITY

Plumbing, bathrooms, washing, and handwashing facilities will be properly maintained and be compliant with all applicable state and local laws, regulations, ordinances, and other requirements. All drain areas will be maintained and routinely inspected so that they do not contribute to the contamination of any inventory or contact surfaces by seepage, filth, or any other extraneous materials, or by providing a breeding place for pests.

#### HEATING, VENTILATING, COOLING, AND AIR FILTRATION

Heating, ventilation, cooling, and air filtration will be installed and maintained by a licensed professional and receive routine maintenance, as needed, to ensure proper functioning of all environmental controls installed throughout the Facility.

#### ENVIRONMENTAL CONTROLS FOR CULTIVATION

Specific environmental controls for cultivation including odor control and air filtration, humidity, and supplemental CO<sub>2</sub> system are described in detail in the Cultivation Plan.

#### FACILITY MAINTENANCE AND CLEANING

The premises will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds, or pests. The premises is designed and constructed in such a manner that all floors, walls, and ceilings can be adequately cleaned, kept clean, and maintained in good sanitary condition. In addition, counters and surfaces shall be constructed so that they reduce the potential growth of microbes, molds and fungi, and can be cleaned easily.

#### DISINFECTANTS AND CLEANING AGENTS

All disinfectants and cleaning agents used in the premises will be registered with the U.S. Environmental Protection Agency and will be used strictly in accordance with their labels and instructions. Commercially available standard cleaning products shall be used for cleaning, sanitizing, and disinfecting. No special cleaning agents are necessary for Elevation Green LLC's

operations. Any cleaning solutions, sanitizing agents, or other cleaning chemicals will be identified, maintained, stored, and disposed of in a manner that avoids the contamination of cannabis goods and complies with the rules set forth by the Licensing Agencies and all applicable state and local laws, regulations, ordinances, and other requirements.

### PEST CONTROL

The premises is designed, managed, and monitored to keep out pests, including insects, rodents, and other animals. Effective measures will be taken to exclude pests from the premises and to protect against contamination of cannabis goods and contact surfaces. Litter and waste will be properly removed and disposed of in order to minimize the development of odor and the potential for attracting and harboring pests. Pests will not be allowed to inhabit any area of the premises.

### ANIMALS PROHIBITED

Animals will be prohibited from the premises, except for guard or service dogs in areas where there will be no risk of contamination of cannabis goods or contact surfaces.

### EMPLOYEE TRAINING

Elevation Green LLC will ensure all owners and employees have the education, training, and experience, or any combination thereof, to satisfactorily perform all assigned functions. Employees will be responsible for operating in compliance with all state laws, regulations, and rules regulating commercial cannabis operations.

Employees shall continually demonstrate a working knowledge of training materials and all standard operating procedures as a condition of employment. An annual refresher training will be mandatory regarding all job-related standard operating procedures.

Employee training will be tailored to the roles and responsibilities of the job function of each employee. Employees will receive all applicable training as part of their employee orientation program and while on the job.

### QUALITY ASSURANCE TRAINING

All employees will receive, at a minimum, the following quality assurance training:

- Proper handling and storage practices for maintaining product quality and preventing the deterioration of cannabis goods stored on-site.
- Procedures for ensuring that all cannabis goods authorized for distribution have received a passing certificate of analysis from a licensed testing laboratory.
- Procedures for ensuring that cannabis goods are properly packaged and labeled prior to distribution for retail sale.
- Policies which prohibit employees showing signs of illness, open wounds, sores or skin infections from handling cannabis product or materials that come into contact with cannabis or cannabis product.
- Hygiene training for employees who handle cannabis goods with specific attention to preventing microbial contamination.

- Food Handler's Certification card or any employees responsible for food manufacturing
- Procedures for carrying out all quality control responsibilities assigned to Elevation Green LLC as a licensed commercial cannabis business, including quality assurance reviews, arranging analytical testing, quarantine of products during testing, oversight of laboratory sampling, transportation quality control, and proper storage and handling.

## RETRAINING

Retraining will be conducted annually or whenever there are:

- Changes in Elevation Green LLC's operations that render previous training obsolete.
- Changes in the types of PPE needed to be used render previous training obsolete.
- Inadequacies in an employee's knowledge or performance of job functions indicate the employee has not acquired the requisite understanding or skill.



# DISTRIBUTION PLAN

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## GENERAL OVERVIEW

This Distribution Plan has been developed for Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Distribution Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for safe and secure distribution operations. Distribution policies and procedures will be compliant with the regulations set forth by the Commercial Cannabis licensing authorities, the Bureau of Cannabis Control (BCC) and the Town of Mammoth Lakes (TOML), and all applicable state and local laws, regulations, ordinances, and other requirements relevant to the distribution activities for commercial cannabis goods.

Elevation Green LLC shall only transport cannabis to or from another establishment licensed by the BCC, California Department of Public Health (CDPH), the California Department of Food and Agriculture (CDFA), or any other State commercial cannabis licensing authority (or "Licensing Agencies"). Distribution operating hours may occur 7 days a week, 24 hours a day, with the exception of shipping and receiving activities, for which hours are described below.

## DISTRIBUTION ACTIVITIES

Elevation Green LLC will conduct the following distribution activities:

- Transportation of cannabis goods to the Elevation Green LLC premises from other licensed premises;
- Transportation of cannabis goods to other licensed premises from the Elevation Green LLC premises;
- Receive cannabis goods at the Elevation Green LLC premises from other licensed distributors (or licensed cultivators with a self-transport license);
- Conduct transportation-only services between other licensed premises;
- Packaging, labeling, and rolling of non-manufactured cannabis goods at the Elevation Green LLC premises;
- Storage of cannabis goods at the Elevation Green LLC premises; and
- Arranging for batch sampling and testing of cannabis goods by a licensed testing laboratory.

All Elevation Green LLC owners and employees will undergo training in-house for distribution shipping, receiving, transportation, inventory management, packaging, labeling, producing pre-rolls, and arranging for batch sampling and testing. Training shall cover safety protocols and compliance. A series of scenarios and mock operations will be part of the training program for each activity associated with the distribution operations. Prior to conducting any distribution operations, owners and employees must demonstrate that they have the knowledge, skills, and abilities to conduct these operations safely and in compliance with Licensing Agencies' regulations and internal policies.

## DISTRIBUTION PLAN

### TRANSPORTATION

The following information shall be documented and accompany any transportation activities associated with Elevation Green's distribution operations:

- Wholesale sales invoice;
- Shipping manifest;
- Name, license number, and license premises address of originating licensee;
- Name, license number, and license premises address of receiving licensee;
- Name, license number, and license premises address of licensee transporting cannabis goods;
- Date and time of departure;
- Approximate date and time of departure from subsequent licensed premises for multiple distribution operations;
- Arrival date and estimated time of arrival for each licensed premises;
- Driver's license number of the driver; and
- Make, model, and license plate number of the transport vehicle.

Route guidance will be utilized through an online map/route application. Routes will utilize the most efficient route to/from the licensee's addresses and other necessary stop locations. In addition, training and maps are provided to each owner, or employee driver, for roads that are prohibited for transporting cannabis goods due to federal ownership. In addition, maps and information for seasonal road closures are provided to the drivers. For real-time road conditions such as chain-control requirements and detours, drivers will also utilize the Caltrans Quick Map application. Vehicles will not leave California while conducting distribution operations.

Elevation Green LLC owners or employees may make stops only associated with the distribution operations such as refueling or vehicle maintenance. No other stops are authorized except for required employee breaks for rest and/or meals. Any stop will be recorded and logged by the employee including the purpose for the stop, time, duration, and vehicle mileage at the time of the stop. If the employee leaves the vehicle unattended for the purposes of these stops, it will not be in a residential area and they will ensure the inventory storage is locked and secured and the vehicle itself is locked, secured, and the alarm is set.

### TRANSPORTATION VEHICLE REQUIREMENTS

Cannabis goods shall be stored in the vehicle in a locked box, cage, or container that is secured to the body of the vehicle. No part of the box/cage/container will include portions of the vehicle body. No cannabis will be visible from outside of the vehicle. The shipping manifest and invoice shall be kept with the onboard inventory at all times when transporting cannabis goods. The locked box/cage/container remains locked at all times except to conduct shipment orders to licensed premises or to receive orders from licensed premises. A locked box or safe shall be affixed to the vehicle for storage of cash while distribution transportation activities are being conducted.

No persons are allowed in the transportation vehicle that are not associated with conducting the distribution service, they must be an owner or employee authorized to conduct the specific

## DISTRIBUTION PLAN

distribution activity. Proof that Elevation Green LLC owns the transportation vehicle, the year, make, model, license plate number, VIN number, and proof of insurance shall remain in the vehicle and will be provided to the BCC.

### SHIPPING AND RECEIVING

Shipping and receiving activities for cannabis goods will only be conducted within the designated limited-access shipping and receiving area as shown on the Premises Map, which is through a secured entrance. Only owners or qualified employees will conduct shipment preparation and receiving activities and maintain security in the designated shipping and receiving space. Security procedures, as outlined in the Security and Safety Plan, are in place to ensure the safety and security of the Elevation Green LLC owners and employees, the cannabis goods, the facility, vehicle, and any persons conducting a delivery. Access is controlled through the security system, video surveillance is in place 24 hours a day/7 days a week, identification verification is required for anyone that is not an owner or employee of Elevation Green LLC, and the security system includes silent alarm capabilities to notify law enforcement of any forced intrusion. Shipping and receiving operations shall only occur between the hours of 7am and 10pm, 7 days a week for activities within the Town of Mammoth Lakes. Shipping/deliveries of cannabis goods to licensees outside the municipal boundaries of the Town of Mammoth Lakes shall occur between the hours of 6am and 10pm, unless otherwise restricted by the local jurisdiction at the location of the licensee.

### SHIPPING

Elevation Green LLC has established clear chain of custody protocols for all cannabis goods. All cannabis goods to be transported to a licensed retailer shall be in their final packaged form and meet all packaging, labeling, and testing requirements established by the Licensing Agencies prior to preparation for transport. Copies of Certificates of Analysis shall accompany any shipments of cannabis goods where laboratory testing has been conducted. All cannabis goods shall be inspected for compliance with these requirements as shipments are prepared. A shipping manifest shall be prepared in the Track and Trace system that includes the shipment information described above under Transportation, a list of all inventory in the shipment (Including corresponding UIDS) and total weight or total number of units for each item/UID. An invoice shall accompany each shipment that includes the items on the manifest, the wholesale cost for each unit/weight, any discounts applied, any applicable excise taxes to be collected, and total amount collected.

### RECEIVING

Elevation Green LLC's owners, or management designee, shall be present when cannabis products are received at the Elevation Green LLC premises. Only owners or employees of Elevation Green LLC may receive cannabis goods at the Elevation Green LLC premises from another licensee. Receiving procedures are monitored using real-time video surveillance and software terminal remote viewing at the Elevation Green LLC premises. Licensed distributor employees arriving at the Elevation Green LLC premises to conduct deliveries are required to provide identification and employer verification, which will be reviewed and verified, and the employee will be signed in as an escorted visitor prior to accessing the licensed premises with an Elevation Green LLC owner or employee escort. Cannabis goods being received will be

## DISTRIBUTION PLAN

checked to ensure they meet track and trace standards, potency standards, testing standards, labeling standards, and packaging standards (as applicable).

The invoice accompanying the shipment being received shall be compared to the shipping manifest and actual physical inventory count prior to the acceptance of any cannabis goods. If discrepancies in the shipping documents for cannabis goods are found, those items or batches shall be rejected and sent back with the employee to the other licensee. The shipping manifest shall be reviewed to ensure that it includes the shipment information described above under Transportation, a list of all inventory in the shipment (Including corresponding UUIDs) and total weight or total number of units for each item/UUID. The invoice accompanying each shipment shall be reviewed to ensure that it includes the items on the manifest, the wholesale cost for each unit/weight, any discounts applied, any applicable cultivation taxes to be collected, and total amount collected. All inventory received or rejected shall be recorded in the Track and Trace system within 24 hours of receipt or rejection.

### PACKAGING, LABELING, AND ROLLING

Elevation Green LLC will package, re-package, label, and re-label cannabis goods for retail sale. Under the Distribution operations, Elevation Green LLC will also produce pre-rolls that consist exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls will be prepared and packaged in their final retail packaging prior to regulatory compliance testing. Elevation Green LLC shall only conduct labeling and re-labeling of manufactured cannabis goods packages with the amount of cannabinoids and terpenoids based on regulatory compliance testing results. Elevation Green LLC shall verify compliance with all packaging and labeling standards for all cannabis goods, regardless of the origin of the packaged cannabis goods, from Elevation Green LLC or another licensee. Elevation Green LLC's packaging and labeling protocols are described in the Packaging and Labeling Plan.

### ROLLING

Elevation Green LLC shall produce pre-rolls utilizing processed cannabis from either Elevation Green LLC's own cultivation operations, or processed cannabis purchased from a licensed cultivator. Under the Distribution operations of the Microbusiness, Elevation Green LLC will produce pre-rolls consisting exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls shall be produced by hand utilizing a cone-filling machine/device to ensure quality assurance/quality control objectives are met for product quality and weight. Pre-rolls shall be packaged and labeled consistent with the packaging and labeling requirements as outlined in the Packaging and Labeling Plan. Pre-rolls produced by Elevation Green LLC that include infusion of manufactured cannabis such as concentrate or oil, are described in Elevation Green LLC's Manufacturing Plan.

### ARRANGING BATCH SAMPLING AND TESTING

Elevation Green LLC will arrange for batch sampling and testing of cannabis goods by a licensed cannabis testing facility. When Elevation Green LLC arranges for testing of batches of cannabis goods, the batches shall be stored separately and distinctly from other cannabis goods batches and properly labeled so they can be easily identified. The batch storage area for cannabis

## DISTRIBUTION PLAN

goods awaiting testing or awaiting testing results are shown on the Premises map within the Secure Product Storage Area.

For batch sampling at the Elevation Green LLC premises, the following conditions shall apply:

- A video recording of the batch sampling shall occur during the entire sampling process including a recording of the written batch number to be shown in the video at the beginning of sampling
- Batch sampling protocols and quantities shall be adhered to for the type of cannabis goods being tested and size/quantity of the batch
- Laboratory and Distributor employees shall sign and date the chain of custody (COC) prior to transferring the samples of cannabis goods to the laboratory employee for testing

For any batches that fail testing:

- The failed batch is maintained in quarantine for remediation or transport to a manufacturer for remediation
- A corrective action plan shall be submitted by a licensed manufacturer to the California Department of Public Health for approval within 30 days of issuance of the failed COA
- The remediation must be completed within 30 days of approval from the California Department of Public Health or Bureau
- If the failed batch cannot be remediated, Elevation Green LLC shall destroy the failed batch within 30 days and record the destruction in the Track and Trace system

## STORAGE-ONLY SERVICES

Elevation Green LLC may provide storage-only services unrelated to the quality assurance and laboratory testing processes for other licensees. Storage-only services will only be provided for cannabis goods that are packaged as they will be sold at a retailer, cannabis accessories, and a licensees' branded merchandise or promotional materials. Elevation Green LLC shall not store immature cannabis plants, except for seeds.

## INVENTORY CONTROL

Cannabis goods shall be stored in a secured product storage area as shown on the Premises Map. In order to avoid accumulation of expired and obsolete cannabis goods (and ensure a zero- waste operation), cannabis goods will be stored and transported on a first-in/first-out (FIFO) or first- expiry/first-out (FEFO) basis. The cannabis inventory control system will record the expiry date and the date of receipt. Cannabis goods will be stored so that earliest-expiring or first delivered batches can be selected for transportation to licensed retailers. Cannabis goods are stored in an accessible position, and hand selected to ensure FIFO and FEFO inventory control measures are adhered to. If packaged cannabis goods are received that have an earlier expiry date than previously received inventory of the same item, then a FEFO (first expired, first out) system is used, this stock will be "promoted" in the inventory storage so that it is issued before the later-expiring products. Additional details regarding Elevation Green LLC's inventory management is described in the Inventory Management Plan.

## DISTRIBUTION PLAN

### PERFORMANCING MONITORING AND REPORTING

Elevation Green LLC owners, or a designated inventory manager, will monitor and evaluate its storage of cannabis inventory and distribution operations to identify problems in the system that need to be addressed. Recordkeeping and reporting systems are designed to make the collection of data for routine monitoring as simple as possible. Inventory records shall be maintained to monitor how effectively inventory is managed and moving through the distribution process to licensed retailers. Elevation Green LLC will ensure maintenance of accurate and up to date inventory records. The records shall provide detailed evidence of how cannabis products flow through the inventory and distribution process, in order to identify where problems are occurring so that corrective action can be taken. Owners of Elevation Green LLC shall oversee all track and trace requirements for cannabis goods. The owners shall ensure proper compliance and reporting is conducted for all cannabis goods in the California Track and Trace system.

Elevation Green LLC's inventory management is designed to ensure that cannabis goods are electronically logged, verified, and monitored as cannabis goods move through the supply chain. Accountability is ingrained throughout Elevation Green LLC's organization. To accomplish inventory management objectives, Inventory control outcomes will be achieved by:

1. Accurately tracking products in the inventory system;
2. Maintaining real-time connection to the state required track and trace system;
3. Providing a safe and secure chain of custody for cannabis products with clear safeguards and protections against product diversions;
4. Auditing and reconciling inventory at minimum, every 30 days; and
5. Having an established clear protocol for dealing with any breach or failure of our track and trace or security system if needed, including suspending operations and notifying the Department and/or local law enforcement as necessary.

More information regarding inventory management procedures can be found in the Inventory Management Plan.

### TRACK AND TRACE SYSTEM

Elevation Green LLC will use the statewide Track and Trace system (currently METRC) to record all activities associated with the Distribution operations including:

- Receiving cannabis goods from a licensed cultivator, nursery, manufacturer, or distributor;
- Distributing cannabis goods to a licensed manufacturer, distributor, or retailer;
- Packaging, labeling, and rolling of non-manufactured cannabis goods;
- Arranging for testing of cannabis goods; and
- Storage of cannabis goods.

Track and Trace procedures are further detailed in the Inventory Management Plan.

### COLLECTION OF CANNABIS TAXES

Elevation Green LLC shall collect cultivation taxes for cannabis goods received from licensed cultivators and manufacturers. Excise taxes shall be collected from licensed retailers. Elevation Green LLC will designate an owner or employee to oversee the tax collection standards, including the collection, storage, reporting, and payment of taxes to the local and state governing bodies.

### EXPOSURE ANALYSIS

Elevation Green LLC will periodically conduct an exposure analysis to identify or evaluate known or reasonably foreseeable exposure hazards, such as theft or trespass, associated with the transportation of cannabis goods and transfer practices at the premises. The exposure analysis will be done in order to determine whether any potential exposures exist and require preventive controls. The process will include the identification of critical control points, the steps or procedures in a given process in which control can be applied, and as a result, a hazard can be prevented or eliminated.



# INVENTORY MANAGEMENT PLAN

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This Inventory Management Plan has been developed for the Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Inventory Management Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for inventory management at the premises. Elevation Green LLC shall maintain and track all cannabis inventory in the California Track and Trace System (currently METRC) as outlined below.

All cannabis or cannabis products received and/or produced shall be assigned and applied Unique Identifier (UID) tags, and then reported into the Track and Trace System (currently METRC). Two types of tagged inventory shall be tracked by Elevation Green LLC in METRC: plants and packages utilizing UID tags, for both Adult-Use and Medical. UID tags will be ordered through METRC for inventory tracking. UID tags use radio-frequency identification (RFID) transponders that allow for automatic remote reading and, as a result, identification of the cannabis and cannabis products that have been tagged. The UID numbers assigned to cannabis and cannabis products allow the METRC system to track and trace all cannabis and cannabis products through the commercial cannabis supply chain. Information embedded in the tags includes the facility name, business license number, the date the tag was ordered, a unique 24-digit identification number, and a bar code that matches the identification number programmed on the RFID.

## PLANTS

Cannabis plants are considered either immature or flowering. All cannabis plants will enter the system through immature plant lots (up to 100 plants in one lot). UID tags will be applied to immature plants (up to 100 plants in one lot) and the tag assignment reported into METRC and assigned one UID plant tag. Each immature plant will be labelled individually with the 24-digit UID from the immature plant lot tag. When immature plants in a lot are ready to be moved into the Mature Canopy/Flower Room, they will be moved into the room and UID tags will be attached at the base of each plant. Each individual flowering plant and all plants in the Elevation Green LLC's designated canopy areas will have an assigned individual plant tag, affixed at the base of each flowering plant.

The following information shall be entered into METRC for cultivation operations:

- Medical or Adult Use – Medical or Adult-Use plants shall be identified, appropriately tagged, and tracked accordingly throughout the supply chain process
- Harvest Name – Harvest name, required to be unique name. Strain Name & Harvest Date is recommended best practice.
- Weight – the plant in its entirety after being cut from root ball (stems, stalk, flower, leaves, trim, etc.)
- Waste – Waste may include stems, stalk, flower, leaf, trim, etc. This may include multiple entries but will be reported within 3 days after it is created.

- Package – package with unique identifier (flower, leaf, kief, fresh cannabis plant, or pre-rolls)
- Finish – when Harvest Batch (HB) is completely done (packages created and waste calculated), they will be marked as ‘Finished’ in METRC as packages and tracked through the supply chain as packages as described below. Any remaining weight associated to the HB is considered moisture loss. Harvest will be completed within 60 days.

Plant inventory during the cultivation process shall be stored in the appropriate location for the cultivation phase as shown on the Premises Map:

- Immature Plants shall be located in the Mother Room, Clone Room, and Veg room and will include applicable UID tags.
- Flowering Plants shall be located in the Flower/Mature Canopy Room with UID tags affixed at the base of each plant.
- Harvested and drying plants shall be located in the Drying and Harvest Storage Room with UID tags.
- Harvested plants shall be processed in the Non-Manufactured Cannabis Processing and Packaging Room and then stored in either the Drying and Harvest Storage Room or the Non-Manufactured Cannabis Processing and Packaging Room while they await packaging or pre-roll manufacturing.
- Processed cannabis shall be packaged or made into pre-rolls then packaged and labeled in the Non-Manufactured Cannabis Processing and Packaging Room.
- Processed cannabis intended for use in manufacturing of infused pre-rolls shall be moved into the Secure Cannabis Ingredient Storage cabinet in the Manufacturing Room.
- Packaged cannabis shall be moved to the Secure Product Storage Area in Unit B as shown on the Premises Map for testing. Batch sampling and testing procedures are outlined below.

## PACKAGES

Packages are created from immature plants, harvest batches, non-manufactured cannabis, and production batches. The package tag has an adhesive backing and can be applied easily. Package tags will be used for transferring packages and tracking finished products in the commercial chain of custody—from seed to sale. Packages shall be identified as Medical or Adult-Use.

For manufacturing operations, harvest packages from Elevation Green LLC’s cultivation operations or from another licensee, or packages of manufactured cannabis goods from another licensee, shall be deemed as production batches for use in manufacturing. Production batches will be used to make infused products such as infused edibles or infused non-edible products, or used to make mechanical extracts. Once infused products are manufactured, they will be packaged and labeled and converted in METRC as a new package, with the UID tracked throughout the process, even after conversion. A new UID may be assigned as necessary if converting or splitting from a previous UID. All UIDs and associated cannabis shall be tracked and traced throughout the supply chain process while at Elevation Green LLC.

Any amount of harvested cannabis or manufactured cannabis product that may be sold, manufactured, or transferred, shall be placed into one or more packages, each package having a UID (package tag) created in METRC. Any product must have a UID which and will be physically attached to the package. Packages may be repacked into a new package in METRC.

## WEIGHTS AND MEASURES

Weighing devices used by Elevation Green LLC shall be approved, tested, and sealed in accordance with the requirements in Chapter 5 (commencing with section 12500) of Division 5 of the Business and Professions Code, and registered with the county sealer consistent with Chapter 2 (commencing with section 12240) of Division 5 of the Business and Professions Code. Approved and registered devices shall be used whenever:

- Cannabis or cannabis product is bought or sold by weight or count;
- Cannabis or cannabis product is packaged for sale by weight or count;
- Cannabis or cannabis product is weighed or counted for entry into the track-and-trace system; and
- The weighing device is used for commercial purposes as defined in section 12500 of the Business and Professions Code.

For the purposes of this section, “count” means the numerical count of the individual cannabis product units. Whenever Elevation Green LLC is determining the weight, measure, or count of cannabis and cannabis products for the purposes specified above, the weight, measure, or count shall be determined by a licensed weighmaster as required by Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code. The weighmaster certificate required under section 12711 of the Business and Professions Code shall not be required when cannabis or cannabis products are weighed.

## STORAGE

### CULTIVATION

Plant inventory during the cultivation process shall be stored in the appropriate location for the cultivation phase as shown on the Premises Map:

- Immature Plants shall be located in the Mother Room, Clone Room, and Veg Room and will include applicable UID tags.
- Flowering Plants shall be located in the Flower/Mature Canopy Room with UID tags affixed at the base of each plant. UID Tags shall be either Medical or Adult-Use.
- Harvested and drying plants shall be located in the Drying and Harvest Storage Room with UID tags.
- Harvested plants shall be processed in the Non-Manufactured Cannabis Processing and Packaging Room and then stored in either the Drying and Harvest Storage Room or the Non-Manufactured Cannabis Processing and Packaging Room while they await packaging or pre-roll manufacturing.

- Processed cannabis shall be packaged or made into pre-rolls then packaged and labeled in the Non-Manufactured Cannabis Processing and Packaging Room.
- Processed cannabis intended for use in manufacturing of infused pre-rolls shall be moved into the Secure Cannabis Ingredient Storage cabinet in the Manufacturing Room.
- Packaged cannabis shall be moved to the Secure Product Storage Area in Unit B as shown on the Premises Map for testing. Batch sampling and testing procedures are outlined below.

## MANUFACTURING

Cannabis goods to be used in manufacturing operations shall be stored in the Secure Cannabis Ingredient Storage cabinet as shown on the Premises Map in Unit B in the Manufacturing Room. Cannabis goods shall be clearly identified and stored as Medical or Adult-Use. In order to avoid accumulation of expired and obsolete cannabis goods (and ensure a zero- waste operation), cannabis goods used in manufacturing operations will be stored on a first-in/first-out (FIFO) or first- expiry/first-out (FEFO) basis. The cannabis inventory control system will record the expiry date and the date of receipt. Cannabis goods will be stored so that earliest-expiring or first delivered batches can be selected for manufacturing. Cannabis goods are stored in an accessible position, and hand selected to ensure FIFO and FEFO inventory control measures are adhered to. If packaged cannabis goods for manufacturing are received that have an earlier expiry date than previously received inventory of the same item, then a FEFO (first expired, first out) system is used, this stock will be “promoted” in the inventory storage so that it used before the later-expiring products.

## DISTRIBUTION

Cannabis goods shall be stored in a secured product storage area as shown on the Premises Map in Unit B. Cannabis goods shall be clearly identified and stored as Medical or Adult-Use. In order to avoid accumulation of expired and obsolete cannabis goods (and ensure a zero- waste operation), cannabis goods will be stored and transported on a first-in/first-out (FIFO) or first- expiry/first-out (FEFO) basis. The cannabis inventory control system will record the expiry date and the date of receipt. Cannabis goods will be stored so that earliest-expiring or first delivered batches can be selected for transportation to licensees. Cannabis goods are stored in an accessible position, and hand selected to ensure FIFO and FEFO inventory control measures are adhered to. If packaged cannabis goods are received that have an earlier expiry date than previously received inventory of the same item, then a FEFO (first expired, first out) system is used, this stock will be “promoted” in the inventory storage so that it is issued before the later-expiring products.

## ARRANGING BATCH SAMPLING AND TESTING

Elevation Green LLC will arrange for batch sampling and testing of cannabis goods by a licensed cannabis testing facility. When Elevation Green LLC arranges for testing of batches of cannabis goods, the batches shall be stored separately and distinctly from other cannabis goods batches and properly labeled so they can be easily identified. The batch storage area for cannabis

goods awaiting testing or awaiting testing results are shown on the Premises map within the Secure Product Storage Area.

For batch sampling at the Elevation Green LLC premises, the following conditions shall apply:

- A video recording of the batch sampling shall occur during the entire sampling process including a recording of the written batch number to be shown in the video at the beginning of sampling
- Batch sampling protocols and quantities shall be adhered to for the type of cannabis goods being tested and size/quantity of the batch
- Laboratory and Distributor employees shall sign and date the chain of custody (COC) prior to transferring the samples of cannabis goods to the laboratory employee for testing

For any batches that fail testing:

- The failed batch is maintained in quarantine for remediation or transport to a manufacturer for remediation
- A corrective action plan shall be submitted by a licensed manufacturer to the California Department of Public Health for approval within 30 days of issuance of the failed COA
- The remediation must be completed within 30 days of approval from the California Department of Public Health or Bureau
- If the failed batch cannot be remediated, Elevation Green LLC shall destroy the failed batch within 30 days and record the destruction in the Track and Trace system

## TRANSFERS

Any time cannabis or a cannabis product moves to another licensee from Elevation Green LLC or to Elevation Green LLC from another license, the transfer will be logged into METRC. The transfer process is described in Elevation Green LLC's Distribution Plan

## CANNABIS WASTE

Leaves removed from an individual cannabis plant prior to harvest shall be weighed and entered as waste into the METRC under the individual plant tag's, or plant batch tag's, unique identifier number. If removing leaves, along with stems, etc., as a part of a harvest, the total combined weight of the harvest waste—the leaves, stalks, and stems—associated with a unique harvest-batch name will be entered into the METRC under that same harvest-batch name. Consistent with the California Department of Food and Agriculture's cannabis cultivation regulations, cannabis waste associated with a harvest batch will be recorded within three calendar days after it has been created. Management of cannabis waste is described in Elevation Green LLC's Waste Management Plan.

## QUALITY ASSURANCE/QUALITY CONTROL

Elevation Green LLC shall implement quality assurance and quality control procedures. Establish ongoing inventory controls and procedures for the conduct of inventory reviews and

comprehensive inventories of cannabis for traceability, which shall enable Elevation Green LLC to detect any error, diversion, theft, or loss in a timely manner. Quality Control measures are further detailed in the Quality Control Plan, Manufacturing Plan, and Packaging and Labeling Plan.

### INCOMING CANNABIS

Elevation Green LLC will develop, implement, and maintain sanitation and quality control practices that ensure the safety and quality of cannabis obtained for packaging and manufacturing, including purity and consistency. All incoming cannabis will be inspected by two (2) or more trained owners and/or employees to determine:

- Organoleptic characteristics (color, texture and odor);
- Presentation of the material (raw, cut, crushed, compressed);
- The presence of admixtures, foreign matter (sand, glass particles, dirt), mold, or signs of decay;
- The presence of insects; and
- The presence of foreign material originating from poor or degraded containers.

### INCOMING CANNABIS TESTING

All cannabis received by Elevation Green LLC must be tested for contaminants and cannabinoid and terpenoid profile, though testing of cannabis that will undergo further processing before sale is not required by state law or regulation. Elevation Green LLC will work with other licensees who provide cannabis for Elevation Green LLC's manufacturing operation to ensure all incoming cannabis is tested and confirmed to meet specifications for purity and potency prior to transfer. In order to be accepted into Elevation Green LLC's inventory, all incoming cannabis must be free of:

- Seeds and stems;
- Dirt, sand, debris, and other foreign matter; and
- Contamination by mold, rot, other fungus and bacterial diseases.

In lieu of Elevation Green LLC's-initiated testing with an independent testing laboratory, a lot specific report or Certificate of Analysis may be accepted from the supplier of the cannabis provided the results are reported by an independent testing laboratory that is licensed by the state of California. Elevation Green LLC will establish the reliability of the supplier's analyses through confirmation of the supplier's test results at appropriate intervals. Batch sampling and storage procedure are described in the Distribution Plan.

### INCOMING NON-CANNABIS MATERIALS FOR MANUFACTURING

Elevation Green LLC shall utilize non-cannabis materials for infusion manufacturing operations. Only materials that meet or exceed best standards for quality and are compliant with the rules set forth by the California Department of Public Health and Mono County Health Department, and all applicable state and local laws, regulations, ordinances, and other requirements, may be utilized by Elevation Green LLC.

All production materials, packaging components, labeling, and other supplies will be physically inspected and stored. All containers will be inspected for appropriate labeling as to contents, container damage, or broken seals and contamination. When shipments are received, each container will be inspected for physical damage by Elevation Green LLC employees. If there is slight or moderate physical damage, the material will be more closely inspected. If any damage is found, the material in question will not be permitted into the premises and Elevation Green LLC owners will be immediately notified.

## RECORD KEEPING

Elevation Green LLC's recordkeeping has been designed to meet or exceed the regulatory requirements of the Licensing Agencies. Elevation Green LLC will ensure that required records will be maintained in electronic format and in paper format when appropriate. If in a paper format, the records and documents will remain in a locked in a secure storage room and area with access to such records and documents limited to owners and authorized Elevation Green LLC employees. For security and emergency purposes, Elevation Green LLC will keep all files in one central location that can easily be accessed without being dependent on a single person. The same principle applies to electronic files, which will be kept on a shared server or recordkeeping system rather than on an individual's workstation. If in an electronic format, access to such records will be protected by a password that will be available only to authorized employees who have a need to access or create such records in accordance with their job function, and electronic records will be backed up on a server that is maintained offsite.

Some original documents will still be kept in paper copies, but will also be digitized. Access to files will be limited to only those who have a specific business purpose for doing so and security protocols should be set up accordingly. Elevation Green LLC shall periodically review access logs and follow-up on any unusual activity.

Organizational recordkeeping audits will entail standard compliance pertaining to business documentation to be maintained, both physically and digitally. Upon request from the Licensing Agencies, Elevation Green LLC will consent to have all relevant records inspected.

Elevation Green LLC will retain records in a format that is readily understood by a reasonably prudent business person and such recordkeeping of documents will include:

- Books and records necessary to fully account for each business transaction conducted.
- A current Elevation Green LLC employee list complete with identification numbers.
- The business contact information for our security service vendor(s) that maintain the video surveillance and alarm system.
- A current diagram of the licensed premises including all restricted and limited access areas.
- Visitor access and log information to as defined in the Security and Safety Plan.
- Records that a business would normally retain for tax purposes.
- Accurate and comprehensive seed-to-sale inventory tracking metrics and records.
- Manifests, invoices, and transportation records for all cannabis goods transported to and from the Elevation Green LLC premises.



# MANUFACTURING PLAN

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## GENERAL OVERVIEW

This Manufacturing Plan has been developed for Elevation Green LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Manufacturing Plan outlines standard practices and procedures that will be implemented by Elevation Green LLC for safe and secure manufacturing operations. Manufacturing policies and procedures will be compliant with the regulations set forth by the Commercial Cannabis licensing authorities, the Bureau of Cannabis Control (BCC) the Town of Mammoth Lakes (TOML), California Department of Public Health (CDPH), the California Department of Food and Agriculture (CDFA), or any other State commercial cannabis licensing authority (“Licensing Agencies”) and all applicable state and local laws, regulations, ordinances, and other requirements relevant to the manufacturing activities for commercial cannabis goods. Manufacturing operations may occur 24 hours a day, 7 days a week except for receiving of deliveries. Receiving activities shall only occur between the hours of 7am and 10pm, 7 days a week for activities within the Town of Mammoth Lakes.

## PRODUCTS TO BE MANUFACTURED

Elevation Green LLC intends to manufacture the following cannabis goods:

- Edibles – Gummies, hard candies, lozenges, chocolates, chocolate covered non-perishable food products, infused cooking oils and honey, and other infused non-perishable food products
- Vape Cartridges – Vape cartridges filled by Elevation Green LLC with concentrated cannabis oil obtained from another licensed manufacturer
- Disposable Vape Pens – Disposable vape pens filled by Elevation Green LLC with concentrated cannabis oil obtained from another licensed manufacturer
- Infused Pre-Rolls – Pre-rolls infused with concentrated cannabis obtained from another licensed manufacturer or from mechanically extracted concentrated cannabis produced by Elevation Green LLC.
- Uninfused Pre-Rolls – Pre-rolls consisting exclusively of any combination of flower, shake, leaf, or kief
- Mechanical Extracts – Mechanically extracted concentrated cannabis such as hash and rosin

Elevation Green LLC’s manufacturing methods will not include volatile extraction, supercritical CO<sub>2</sub> extraction, butane, propane, or ethanol solvents. Elevation Green LLC will purchase products that are made using these methods from a licensed cannabis manufacturer for use in Elevation Green LLC’s manufacturing operations.

### EDIBLES

Elevation Green LLC shall manufacture gummies, hard candies, lozenges, chocolates, chocolate covered non-perishable food products, infused cooking oils and honey, and other infused non-perishable food products. No baked goods such as cookies, cakes, or pies will be manufactured by Elevation Green LLC. Non-cannabis ingredients shall comply with all requirements for food manufacturing. Cannabis concentrates shall comply with all requirements of the Licensing Agencies. To make edibles, non-cannabis ingredients are mixed with concentrated cannabis such as oil, soluble powders, distillate, or other semi-solid or solid concentrates. To mix a batch, the non-cannabis ingredients, and sometimes the cannabis concentrate, may need to be heated to be thoroughly mixed for consistent texture and potency throughout. The cannabis infused mixture shall then be put into molds or containers, depending on the product being produced. Products requiring cooling or hardening shall be allowed to rest on food racks or in the refrigerator. Recipes shall be developed and applied using established manufacturing protocols to ensure accurate batch quantities are made to meet the quantity and dosing standards of the edible products. Edibles will then be packaged, labeled, and tested according to the standards outlined in Elevation Green LLC's Packaging and Labeling Plan.

### VAPE CARTRIDGES AND DISPOSABLE VAPE PENS

Elevation Green LLC shall purchase liquid concentrated cannabis from a licensed manufacturer. Individual vape cartridges and disposable vape pens will then be filled by hand or using a cartridge filling machine. Cartridges and pens will then be sealed, packaged, labeled, and tested according to the standards outlined in Elevation Green LLC's Packaging and Labeling Plan.

### INFUSED PRE-ROLLS

Elevation Green LLC shall produce infused pre-rolls first by utilizing processed cannabis from either Elevation Green LLC's own cultivation operations or processed cannabis from another licensed cultivator or manufacturer. Cannabis concentrate used for infusion shall be obtained from a licensed manufacturer and/or from concentrates mechanically extracted by Elevation Green LLC. Infused pre-rolls shall incorporate cannabis concentrate, either inside the pre-roll or on the surface of the pre-roll. Another type of infused pre-roll that Elevation Green LLC may manufacture is a caviar pre-roll, which is made when cannabis flower is soaked in potent hash oil and often, but not always, coated in kief. The caviar pre-roll is then made by carefully grinding up the soaked flower and rolling them in a pre-rolled. Infused Pre-rolls shall be packaged, labeled, and tested according to the standards outlined in Elevation Green LLC's Packaging and Labeling Plan.

### UNINFUSED PRE-ROLLS

Elevation Green LLC shall produce uninfused pre-rolls utilizing processed cannabis from either Elevation Green LLC's own cultivation operations, or processed cannabis purchased from another licensed cultivator. Uninfused pre-rolls shall consist exclusively of any combination of flower, shake, leaf, or kief. Pre-rolls shall be produced by hand utilizing a cone-filing machine/device to ensure quality assurance/quality control objectives are met for product

quality and weight. Pre-rolls shall be packaged, labeled, and tested according to the standards outlined in Elevation Green LLC's Packaging and Labeling Plan.

### MECHANICALLY EXTRACTED CONCENTRATES

Elevation Green LLC shall manufacture concentrated cannabis products using mechanical separation methods such as centrifugal action, gravity separation, and filtration to separate the trichome glands from the plants. These mechanically-extracted concentrates may include kief, live kief, dry sift, hashish, bubble hash, full-melt hash, and rosin. Elevation Green LLC may use the following mechanical extraction methods:

- Sieving the ground plant by hand or in a mechanical tumbler composed of screens to delicately remove the exposed trichomes, resulting in a powder known as kief. Kief may be further refined using the warm press method below or pressed into hashish for long-term storage.
- The Ice-water method, in which plant material, ice, and water are combined in a vessel and agitated until the trichome glands break off the plant and sink to the bottom.
- Cold and warm press methods, known as making rosin, use heat and pressure to remove the cannabinoids and terpenes from the plant. Heat and pressure are applied to the plant material until the resin glands are excreted from the plant material. Press methods may include the use of press kits, hydraulic presses, handheld presses, heater controllers, and others presses.

Mechanically extracted concentrates shall be packaged, labeled, and tested according to the standards outlined in Elevation Green LLC's Packaging and Labeling Plan.

### EQUIPMENT

Equipment to be used in manufacturing operations shall include:

- Commercial grade utensils, containers, bowls, trays, racks, tables, molds, tins, funnels, cartridge fillers, pre-roll cone-filing machine/device, mixers, press kits, hydraulic presses, handheld presses, heater controllers, storage containers, buckets, sieves, filters, mesh netting, and similar equipment.
- A refrigerator shall be utilized for rapid cooling/setting purposes and to keep ice. No owner or employee personal food items or beverages will be stored in the refrigerator in the manufacturing area.
- A commercial-grade electric table-top cooking pot with built-in mixer to warm or melt ingredients and products during the manufacturing process. The cooking pot shall only be used for manufacturing, not for cooking owner or employee personal food items.

The following manufacturing equipment, or similar equivalent, is proposed for use by Elevation Green LLC in it's manufacturing operations:

### PRE-ROLL EQUIPMENT

#### GRINDERS

Grinders are used to grind cannabis plants into smaller sizes for manufacturing into pre-rolls or concentrates. A variety of screens are included to allow for variations in sizes.

Sensi Shredder Pro

<https://sensishredder.com/grinder-packages/sensi-shredder-pro-package/>

Industrial Cannabis Grinder

<https://customconesusa.com/industrial-cannabis-grinder/>

#### Pre-Roll Machines

Pre-roll machines are used manufacture pre-rolls to maintain production efficiency and consistent size, pack, and weight. The machines are hand-filled and use vibrating motions to achieve the desired results.

King Kone Pre-Rolled Cone Filling Machine

<https://customconesusa.com/metal-king-kone-pre-rolled-cone-filling-machine/>

Industrial Cone Packer 300

<https://customconesusa.com/industrial-cone-packer-300/>

### CARTRIDGE MANUFACTURING EQUIPMENT

#### Cartridge Filler

A cartridge filler is a heated dispenser that can be adjusted to automatically dispense a specified amount of cannabis oil, such as 0.5 grams, to fill cartridges or disposable vape pens. The cartridge filler is also used to apply a specified amount of cannabis oil to pre-rolls in order to manufacture infused pre-rolls.

Fifty Shot Semi-Automatic Cartridge Filler

<https://fiftyshot.com/fiftyshot-semi-automatic-cartridge-filler/>

### MECHANICAL EXTRACTION EQUIPMENT

Mechanical extraction for hash and rosin are described above under the Mechanically Extracted Concentrates section. The equipment listed below is used for the mechanical extraction manufacturing processes.

#### Bubble Hash Extraction Kit

Bubble Magic Hash Extraction Kit

<https://www.amazon.com/Bubble-Magic-Washing-Machine-Extraction/dp/B005EM8VDC>

#### Electric Rosin Presses

Rosinbomb M-60

<https://www.rosinbomb.com/collections/rosin-presses/products/m-60>

ECO Farm 15000

<https://www.ecofarm.ca/products/15000-psi-electric-rosin-rosin-extraction-press-rosin-tech-heat-press>

### EDIBLES MANUFACTURING EQUIPMENT

#### Electric Cooking Pot

An electric cooking pot is used to heat ingredients to a desired temperature and mix ingredients together while doing so. This is a standard piece of equipment used for manufacturing candies.

Savage Brothers Electric Table-Top Cooker/Mixer

<https://www.savagebros.com/p.1/firemixer-14-table-top-automatic-electric-cooker-mixer-with-plc-touch-screen-control.aspx>

Due to the relative infancy of the legal cannabis market, the majority of cannabis manufacturing equipment does not include specification sheets. Links to the manufacturer's websites are included where available equipment information can be found.

## VENTILATION

The equipment used for Elevation Green LLC's manufacturing processes, due to design or size, provides for manufacturing without producing significant amounts of toxic gases, smoke, grease, vapors, or heat and is therefore considered exempt from exhaust hood ventilation requirements.

## PACKAGING AND LABELING REQUIREMENTS

Elevation Green LLC's packaging and labeling standards are outlined in the Packaging and Labeling Plan.

## INVENTORY MANAGEMENT

Inventory management procedures, including storage, inventory management, weighing, and testing, are detailed in the Inventory Management Plan

## QUALITY CONTROL MEASURES

Quality control measures and environmental control measures are described below and further detailed in the Quality Control Plan.

## MANUFACTURING PROCEDURES

### MANUFACTURED CANNABIS PREPARATION REQUIREMENTS

- Hand washing is required immediately prior to handling items and ingredients used for manufacturing cannabis products and after engaging in any activity that contaminates the hands such as after using the toilet, coughing, or sneezing, eating, or smoking.
- Warm water, hand soap and clean towels are available for hand washing.
- All ingredients used in the manufacturing of cannabis products are from an approved source.
- Potable water shall be used for hand washing, ware washing and as an ingredient.
- Water used in manufacturing operations shall be supplied from the Mammoth Community Water District's municipal supply and include all the following:
  - The washing, sanitizing, and drying of any equipment used in the preparation of manufactured cannabis products.
  - The washing, sanitizing, and drying of hands and arms.

- Water used as an ingredient.
- Elevation Green LLC shall have a Certified Professional Food and Safety Manager to oversee the manufacturing of infused cannabis products. Any owner or employee who participates in the manufacturing of infused cannabis food products shall obtain a California Food Handler Certification Card prior to participating in manufacturing operations.
- A person who prepares or packages manufactured cannabis products shall complete a food processor course approved by CDPH to protect the public health within three months of becoming registered and every three years during operation. The course shall not exceed four hours in length. CDPH shall work with the local enforcement agency to ensure that cottage food operators are properly notified of the location, date, and time of the classes offered.
- Manufacturing operations shall properly label all food products in compliance with the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Sec. 343 et seq.) in addition to specific labeling requirements for manufactured commercial cannabis products.

### GROUPS, BUILDING, AND MANUFACTURING PREMISES

- Exterior Facility and Grounds: Elevation Green LLC shall ensure the facility exterior and grounds under the Elevation Green LLC's control meet the following minimum standards:
  - Grounds shall be equipped with draining areas in order to prevent pooled or standing water;
  - Weeds, grass, and vegetation shall be cut within the immediate vicinity of the cannabis manufacturing premises, litter and waste shall be removed, and equipment shall be stored in order to minimize the potential for the grounds to constitute an attractant, breeding place, or harborage for pests;
  - Roads, yards, and parking lots shall be maintained so that these areas do not constitute a source of contamination in areas where cannabis products are handled or transported;
  - Openings into the building (such as windows, exhaust fans, ventilation ducts, or plumbing vent pipes) shall be screened, sealed, or otherwise protected to minimize potential for pests to enter the building;
  - Waste treatment and disposal systems shall be provided and maintained to prevent contamination in areas where cannabis products may be exposed to such a system's waste or waste by-products.
  - Elevation Green LLC shall implement precautions within the premises such as inspection or extermination if the premises is bordered by grounds outside the Elevation Green LLC's control that are not maintained in the manner described in paragraphs above, in order to eliminate any pests, dirt, and filth that pose a source of cannabis product contamination. Any use of insecticide, rodenticide, or other pesticide within the premises shall meet the requirements of Health and Safety Code section 114254.
- Interior Facility: Elevation Green LLC shall ensure construction, design, and maintenance of the interior of the manufacturing premises as follows:

- Walls, ceilings, and floors: Walls, ceilings, and floors shall be constructed of material that is smooth, nonporous, easily cleanable, corrosion-resistant, and suitable to the activity that will be conducted. Fixtures, ducts, and pipes shall not pose a source of drip or condensate that may contaminate cannabis products, contact surfaces or packaging material.
- Lighting. Interior facility lighting shall meet the requirements of subdivisions (a)(1) and (3), (b)(3) and (4), and (c) of section 114252 of the Health and Safety Code. Interior facility lighting shall also meet the requirements for shatter-resistant lighting in section 114252.1 of the Health and Safety Code. The requirements of Health and Safety Code section 114252.1, subdivision (a), shall also apply to all areas where glass breakage may result in the contamination of exposed cannabis, components, or cannabis products at any step of preparation.
- Additional Facility Requirements: Additional facility requirements including water supply, plumbing, sewage disposal, toilet facilities, hand-washing facilities, waste disposal, cleaning and maintenance, heating, humidity controls, odor control measures, janitorial facilities, cleaning equipment and supplies, and poisonous or toxic supplies are described in the Quality Control Plan.

### WATER FOR MANUFACTURING

Water needed for manufacturing operations will be minimal. The manufacturing process itself requires little to no water. Water may be needed to make ice, to use for mixing for mechanical extraction, or to dissolve ingredients for manufacturing. Elevation Green LLC estimates that up to 10 gallons of water may be needed for manufacturing of each production batch, depending on the item being manufactured. Hash manufacturing requires the most water use, cartridge and disposable vape pens will require the least. The majority of manufacturing water use will be from cleaning after each production batch. All equipment, utensils, and manufacturing work areas must be thoroughly cleaned after each production batch. An estimate of up to 30-40 gallons of water will be needed for cleaning after each production batch. Wastewater produced by Elevation Green LLC as part of the manufacturing processes will be from residual non-cannabis ingredients and cleaning products used to clean manufacturing utensils and equipment. Cleaning products used for cleaning manufacturing utensils and equipment shall be those approved for cleaning industrial food equipment and not hazardous for disposal at the wastewater treatment facility. Wastewater is disposed of in the premises through drains connected to the wastewater treatment facility of the Mammoth Community Water District. Any infused cannabis product or infusion cannabis ingredients waste shall be managed and disposed of as described in the Waste Management Plan.

### EQUIPMENT AND UTENSILS

- Equipment and utensils used to produce manufactured cannabis products are clean and maintained in a good state of repair. All food contact surfaces, equipment, and utensils used for the preparation, packaging, or handling of any manufactured cannabis products shall be washed, rinsed, and sanitized before each use. All food preparation and food and equipment storage areas shall be maintained free of rodents and insects.



- All equipment and utensils used in manufacturing, processing, packing, or holding food must be so designed and of such material and workmanship as to be adequately cleanable, and must be adequately maintained to protect against allergen cross-contact and contamination.
- Equipment and utensils must be designed, constructed, and used appropriately to avoid the adulteration of food with lubricants, fuel, metal fragments, contaminated water, or any other contaminants.
- Equipment has been installed to facilitate the cleaning and maintenance of the equipment and of adjacent spaces.
- Food-contact surfaces must be corrosion-resistant when in contact with food.
- Food-contact surfaces must be made of nontoxic materials and designed to withstand the environment of their intended use and the action of food, and, if applicable, cleaning compounds, sanitizing agents, and cleaning procedures.
- Food-contact surfaces must be maintained to protect food from allergen cross-contact and from being contaminated by any source, including unlawful indirect food additives.
- Seams on food-contact surfaces must be smoothly bonded or maintained to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross contact.
- Equipment that is in areas where food is manufactured, processed, packed, or held and that does not come into contact with food must be so constructed that it can be kept in a clean and sanitary condition.
- Holding, conveying, and manufacturing systems, including gravimetric, pneumatic, closed, and automated systems, must be of a design and construction that enables them to be maintained in an appropriate clean and sanitary condition.

### HAND WASHING PROCEDURES

All employees shall thoroughly wash their hands and that portion, if any, of their arms exposed to direct food contact and cleanser and warm water by vigorously rubbing together the surfaces of their lathered hands and arms for at least 10 to 15 seconds and thoroughly rinsing with clean running water followed by drying of the cleaned hands and that portion, if any, of their arms exposed. Employees shall pay particular attention to the areas underneath fingernails and between the fingers. Employees shall wash their hands in all of the following instances:

- Immediately before engaging in food preparations, including working with non-prepackaged food, clean equipment and utensils, and unwrapped single use food containers and utensils.
- After touching bare human body parts other than clean hands, and clean, exposed portions of arms.
- After using the toilet room.
- After coughing, sneezing, using a handkerchief or disposable tissue, using tobacco, eating, or drinking.
- After handling soiled equipment or utensils.

- During food preparation, as often as necessary to remove soil and contamination and to prevent cross-contamination when changing tasks.
- When switching between working with raw food and working with ready-to eat food.
- Before initially donning gloves for working with food.
- After engaging in other activities that contaminate the hands.

### CONTAMINATION BY EMPLOYEES

No employee shall commit any act that may cause the contamination or adulteration of food, food-contact surfaces, or utensils.

### USE OF GLOVES

- Single-use gloves shall be worn when contacting food and food-contact surfaces if the employee has any cuts, sores, rashes, artificial nails, nail polish, rings (other than a plain ring, such as a wedding band), uncleanable orthopedic support devices, or fingernails that are not clean, smooth, or neatly trimmed.
- Whenever gloves are worn, they shall be changed, replaced, or washed as often as hand washing is required by this part. Single-use gloves shall not be washed.
- If used, single-use gloves shall be used for only one task, such as working with ready to-eat food or with raw food of animal origin, used for no other purpose, and shall be discarded when damaged or soiled, or when interruptions in the food handling occur.
- Slash-resistant gloves that are used to protect the hands during operations requiring cutting shall be used only with food that is subsequently cooked as specified in Section 114004, such as frozen food or a primal cut of meat (though not applicable).
- Slash-resistant gloves may be used with ready-to-eat food that will not be subsequently cooked if the slash-resistant gloves have a smooth, durable, and nonabsorbent outer surface or if the slash-resistant gloves are covered with a smooth, durable, nonabsorbent glove, or a single-use glove.
- Cloth gloves may not be used in direct contact with food unless the food is subsequently cooked.

### REQUIREMENTS FOR FOOD

All food shall be manufactured, produced, prepared, compounded, packed, stored, transported, kept for sale, and served so as to be pure and free from adulteration and spoilage; shall have been obtained from approved sources; shall be protected from dirt, vermin, unnecessary handling, droplet contamination, overhead leakage, or other environmental sources of contamination; shall otherwise be fully fit for human consumption; and shall conform to the applicable provisions of the Sherman Food, Drug, and Cosmetic Law (Part 5 (commencing with Section 109875)).

### PROHIBITING ANIMALS

Animals will be prohibited from the premises, except for service dogs in areas where there will be no risk of contamination of cannabis goods or contact surfaces.

## MASTER MANUFACTURING PROTOCOLS

Elevation Green LLC shall establish and follow a written master manufacturing protocol for each unique formulation of cannabis product manufactured, and for each batch size, in order to mitigate against the potential for adulteration through incorporation of incorrect amounts of cannabinoids, unintended ingredients, or hazards identified in the product quality plan; against the potential for misbranding through incorporation of ingredients not identified on the label or the mislabeling of product; and to ensure uniformity in finished batches and across all batches produced. The master manufacturing protocol shall include:

- The name and intended cannabinoid(s) concentration of the cannabis product to be manufactured;
- A complete list of components to be used;
- The weight or measure of each component to be used. The master manufacturing protocol for any given product may include the ability to adjust the weight or measure of cannabinoid-containing ingredients in order to account for the variability of cannabinoid content in harvest batches;
- The identity and weight or measure of each ingredient that will be declared on the ingredients list of the cannabis product;
- The expected yield of the finished product, based upon the quantity of components or packaging to be used in the absence of any loss or error in actual production, and the maximum and minimum percentages of expected yield beyond which a deviation investigation of a batch is necessary and material review is conducted and a decision on the disposition of the product is made;
- A description of packaging and a representative label, or a cross-reference to the physical location of the actual or representative label;
- Written instructions for each point, step, or stage in the manufacturing process; and
- Written instructions for any action to mitigate an identified risk established in the product quality plan.

Nothing requires disclosure of the master manufacturing protocol to any person other than the individuals conducting activities that utilize the protocol or Licensing Agencies and its inspectors and agents. Elevation Green LLC considers the master manufacturing protocol subject to trade secret protection.

## PROCESSES AND CONTROLS

### GENERAL

Management of the manufacturing operations shall take reasonable measures and precautions to ensure the following:

- Disease control. Any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination by which there is a reasonable possibility of food, food-contact surfaces, or food-packaging materials becoming contaminated, must be excluded from any operations which may be expected to result in such contamination until the condition is corrected, unless

conditions such as open lesions, boils, and infected wounds are adequately covered (e.g., by an impermeable cover). Personnel must be instructed to report such health conditions to their supervisors.

- Cleanliness. All persons working in direct contact with food, food-contact surfaces, and food-packaging materials must conform to hygienic practices while on duty to the extent necessary to protect against allergen cross-contact and against contamination of food. The methods for maintaining cleanliness include:
  - Wearing outer garments suitable to the operation in a manner that protects against allergen cross-contact and against the contamination of food, food-contact surfaces, food-packaging materials, and infusion of non-food manufactured cannabis products.
  - Maintaining adequate personal cleanliness.
  - Washing hands thoroughly (and sanitizing if necessary, to protect against contamination with undesirable microorganisms) in an adequate hand-washing facility before starting work, after each absence from the work station, and at any other time when the hands may have become soiled or contaminated.
  - Removing all unsecured jewelry and other objects that might fall into food, equipment, or containers, and removing hand jewelry that cannot be adequately sanitized during periods in which food is manipulated by hand. If such hand jewelry cannot be removed, it may be covered by material which can be maintained in an intact, clean, and sanitary condition and which effectively protects against the contamination by these objects of the food, food-contact surfaces, or food-packaging materials.
  - Maintaining gloves, if they are used in food handling, in an intact, clean, and sanitary condition.
  - Wearing, where appropriate, in an effective manner, hair nets, headbands, caps, beard covers, or other effective hair restraints.
  - Storing clothing or other personal belongings in areas other than where food is exposed or where equipment or utensils are washed.
  - Taking any other necessary precautions to protect against allergen cross-contact and against contamination of food, food-contact surfaces, or food-packaging materials with microorganisms or foreign substances (including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin).
- All operations in the manufacturing, processing, packing, and holding of food (including operations directed to receiving, inspecting, transporting, and segregating) must be conducted in accordance with adequate sanitation principles.
- Appropriate quality control operations must be employed to ensure that food is suitable for human consumption and that food-packaging materials are safe and suitable.
- Overall sanitation of the manufacturing area must be under the supervision of one or more competent individuals assigned responsibility for this function.
- Adequate precautions must be taken to ensure that production procedures do not contribute to allergen cross contact and to contamination from any source.

## MANUFACTURING PLAN

- Chemical, microbial, or extraneous-material testing procedures must be used where necessary to identify sanitation failures or possible allergen cross-contact and food contamination.
- All food that has become contaminated to the extent that it is adulterated must be rejected, or if appropriate, treated or processed to eliminate the contamination.

### CANNABIS PRODUCT COMPONENTS

In order to prevent adulteration of cannabis products, Elevation Green LLC shall establish and implement written policies and procedures to ensure and maintain the quality of product components. Components are subject to the following minimum requirements:

- Raw materials and other components shall be inspected upon intake to ensure that they are clean and suitable for processing into cannabis products, and shall be stored under conditions that protect against allergen cross-contact and contamination, and in such a way as to minimize deterioration.
- Raw materials shall be washed or cleaned as necessary to remove soil and other visible contaminants. Water used for washing, rinsing, or conveying cannabis product ingredients shall be potable.
- Raw materials and other components shall not contain levels of microorganisms that render the cannabis product injurious to human health, or shall be pasteurized or otherwise treated during manufacturing so that they no longer contain levels of microorganisms that would cause the cannabis product to be adulterated.
- Raw materials and other components susceptible to contamination with aflatoxin or other natural toxins, pests, or extraneous material shall not exceed generally acceptable limits set by the U.S. Food and Drug Administration in the Defect Levels Handbook (Rev. February 2005), which is hereby incorporated by reference, before these raw materials or other ingredients are incorporated into finished cannabis products.
- Raw materials and other components shall be held in containers designed and constructed to protect against allergen cross-contact or contamination, and shall be held at such temperature and relative humidity and in such a manner as to prevent the cannabis products from becoming adulterated.
- Frozen raw materials and other components shall be kept frozen. If thawing is required prior to use, it shall be done in a manner that prevents the raw materials and other ingredients from becoming adulterated.
- Raw materials and other components that are food allergens shall be identified and held in a manner that prevents cross-contact with other raw materials or ingredients.
- Holding and storage of raw materials and other components shall meet the requirements of section 114047, subdivisions (a) and (b), section 114049, and section 114051 of the Health and Safety Code.

### PRODUCT QUALITY PLAN

- Elevation Green LLC shall create and implement a written product quality plan for each type of product manufactured at the premises. The product quality plan shall address the hazards associated with the premises or the manufacturing process that, if not

properly mitigated, may cause the product to be adulterated or misbranded, or may cause the product to fail laboratory testing or quality assurance review.

- To create the product quality plan, Elevation Green LLC shall conduct a comprehensive assessment of the overall manufacturing process, identifying each step from component intake through transfer of product from the premises, to determine the potential risks associated with each step, the preventive measures to mitigate the potential risks identified, the methods to evaluate and monitor the effectiveness of the preventive measures, and action to take if a preventive measure was unsuccessful.
- The product quality plan shall evaluate the following potential risks to cannabis product quality:
  - Biological hazards, including microbiological hazards;
  - Chemical hazards, including radiological hazards, pesticide contamination, solvent or other residue, natural toxins, decomposition, or allergens;
  - Physical hazards, such as stone, glass, metal fragments, hair, or insects;
  - Process failures that may lead to product contamination, allergen cross-contact, packaging errors, labeling errors, or other errors affecting cannabis product quality.
- The product quality plan shall identify the preventive measure that will be implemented to mitigate each potential hazard identified above. Examples of preventive measures include, but are not limited to:
  - Cleaning and sanitizing of equipment and utensils to mitigate against risk of microbiological hazards;
  - Conducting in-house testing of raw cannabis to mitigate against the risk of pesticide contamination;
  - Establishing an allergen control program to ensure that allergen cross-contact does not occur between product types;
  - Implementing procedures to ensure homogeneity of cannabinoids into a cannabis product to mitigate against the risk of a non-homogeneous product.
- The product quality plan shall identify methods to evaluate and monitor the effectiveness of the preventive measures in mitigating the potential hazards identified above. Methods for evaluation and monitoring of preventive measures include, but are not limited to, the following:
  - Review of test results conducted to determine contamination such as pesticide residue;
  - Maintaining and reviewing cleaning, sanitizing, or maintenance logs to verify such actions have been taken;
  - Conducting environmental testing to determine if equipment or utensils are contaminated with pathogens;
  - Monitoring the temperature of raw materials that need to be held below 41 degrees Fahrenheit to prevent microbial contamination.
- The product quality plan shall identify actions to be taken if the evaluation and monitoring of the preventive measure indicates that the risk was not properly mitigated. The corrective action shall be specific to the type of product under evaluation and the

specific risk to be mitigated. Examples of corrective actions that may be taken include, but are not limited to:

- Destruction of product components or finished product;
  - Further processing of cannabis extract to remove impurities;
  - Reworking the unfinished product to further homogenize the cannabinoids.
- Elevation Green LLC shall maintain the product quality plans and documentation of preventive measures, monitoring results, and corrective actions and make the records available to the Licensing Agencies upon request, including during a Licensing Agency's onsite inspection of the premises. Nothing in this chapter requires the disclosure of product quality plans other than to the Licensing Agencies and its inspectors and agents. Elevation Green LLC considers the product quality plan subject to trade secret protection.

### HAZARD ANALYSIS

A hazard response plan shall be developed for safety of manufactured cannabis goods.

- Food and manufacturing safety plan
  - Elevation Green LLC shall prepare and implement a written food and cannabis manufacturing safety plan.
  - The food and cannabis manufacturing safety plan shall be prepared, or its preparation overseen, by one or more preventive controls qualified individuals.
- The written food and manufacturing safety plan shall include:
  - The written hazard analysis;
  - The written preventive controls;
  - The written supply-chain program;
  - The written recall plan; and
  - The written procedures for monitoring the implementation of the preventive controls;
  - The written corrective action procedures; and
  - The written verification procedures.
- The food and manufacturing safety plan required by this section is a record that is and must be maintained as such.

Requirements for a hazard analysis:

- Elevation Green LLC shall conduct a hazard analysis to identify and evaluate, based on experience, illness data, scientific reports, and other information, known or reasonably foreseeable hazards for each type of food or product manufactured, processed, packed, or held at the premises to determine whether there are any hazards requiring a preventive control.
- The hazard analysis must be written regardless of its outcome.

The hazard identification must consider:

- Known or reasonably foreseeable hazards that include:
  - Biological hazards, including microbiological hazards such as parasites, environmental pathogens, and other pathogens;



- Chemical hazards, including radiological hazards, substances such as pesticide and drug residues, natural toxins, decomposition, unapproved food or color additives, and food allergens; and
  - Physical hazards (such as stones, glass, and metal fragments); and
- Known or reasonably foreseeable hazards that may be present in the food for any of the following reasons:
  - The hazard occurs naturally;
  - The hazard may be unintentionally introduced; or
  - The hazard may be intentionally introduced for purposes of economic gain.

Hazard evaluation:

- The hazard analysis must include an evaluation of the hazards identified above to assess the severity of the illness or injury if the hazard were to occur and the probability that the hazard will occur in the absence of preventive controls.
  - The hazard evaluation shall include an evaluation of environmental pathogens whenever a ready-to-eat food or manufactured cannabis goods are exposed to the environment prior to packaging and the packaged food or cannabis goods do not receive a treatment or otherwise include a control measure that would significantly minimize the pathogen.
- The hazard evaluation must consider the effect of the following on the safety of the finished food or manufactured products for the intended consumer:
  - The formulation of the food or manufactured products;
  - The condition, function, and design of the facility and equipment;
  - Raw materials and other ingredients;
  - Transportation practices;
  - Manufacturing/processing procedures;
  - Packaging activities and labeling activities;
  - Storage and distribution;
  - Intended or reasonably foreseeable use;
  - Sanitation, including employee hygiene; and
  - Any other relevant factors, such as the temporal (e.g., weather-related) nature of some hazards (e.g., levels of some natural toxins).

PREVENTATIVE CONTROLS

- Elevation Green LLC shall identify and implement preventive controls to provide assurances that any hazards requiring a preventive control will be significantly minimized or prevented and the food and products manufactured, processed, packed, or held by Elevation Green LLC will not be adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug, and Cosmetic Act.
- Preventive controls required above include:
  - Controls at critical control points (CCPs), if there are any CCPs; and
  - Controls, other than those at CCPs, that are also appropriate for food and manufacturing safety.

- Preventive controls shall be written.
- Preventive controls include, as appropriate to the facility, the food, and products manufactured:
  - Process controls. Process controls include procedures, practices, and processes to ensure the control of parameters during operations such as heat processing, acidifying, irradiating, and refrigerating foods. Process controls must include, as appropriate to the nature of the applicable control and its role in the facility's food safety system:
    - Parameters associated with the control of the hazard; and
    - The maximum or minimum value, or combination of values, to which any biological, chemical, or physical parameter must be controlled to significantly minimize or prevent a hazard requiring a process control.
  - Food allergen controls. Food allergen controls include procedures, practices, and processes to control food allergens. Food allergen controls must include those procedures, practices, and processes employed for:
    - Ensuring protection of food and manufactured products from allergen cross-contact, including during storage, handling, and use; and
    - Labeling the finished food and manufactured products, including ensuring that the finished food is not misbranded under section 403(w) of the Federal Food, Drug, and Cosmetic Act and labeling requirements in the CDPH Cannabis Manufacturing regulations.
  - Sanitation controls. Sanitation controls include procedures, practices, and processes to ensure that the facility is maintained in a sanitary condition adequate to significantly minimize or prevent hazards such as environmental pathogens, biological hazards due to employee handling, and food allergen hazards. Sanitation controls must include, as appropriate to the facility and the food and manufactured products, procedures, practices, and processes for the:
    - Cleanliness of food- and manufactured product-contact surfaces, including food- and manufactured product-contact surfaces of utensils and equipment;
    - Prevention of allergen cross-contact and cross-contamination from insanitary objects and from personnel to food and manufactured products, food and manufactured product packaging material, and other food- and manufactured product-contact surfaces and from raw product to processed product.
  - Supply-chain controls. Supply-chain controls include the supply-chain program as required.
  - Recall plan. A recall plan as required.
  - Other controls. Preventive controls include any other procedures, practices, and processes necessary to satisfy the requirements in this section. Examples of other controls include hygiene training and other current good manufacturing practices. For food with a hazard requiring a preventive control:
    - Elevation Green LLC shall establish a written recall plan for the food.

- The written recall plan must include procedures that describe the steps to be taken, and assign responsibility for taking those steps, to perform the following actions as appropriate to the facility:
  - Directly notify the direct consignees of the food or manufactured products being recalled, including how to return or dispose of the affected items;
  - Notify the public about any hazard presented by the food or manufactured products when appropriate to protect public health;
  - Conduct effectiveness checks to verify that the recall is carried out; and
  - Appropriately dispose of recalled food and manufactured products as required and outlined in the Waste Management Plan.

#### PREVENTATIVE CONTROL MANAGEMENT COMPONENTS

The preventive controls required are subject to the following preventive control management components as appropriate to ensure the effectiveness of the preventive controls, considering the nature of the preventive control and its role in the facility's food safety system:

- Monitoring;
- Corrective actions and corrections; and
- Verification.

The supply-chain program is subject to the following preventive control management components as appropriate to ensure the effectiveness of the supply-chain program, considering the nature of the hazard controlled before receipt of the raw material or other ingredient:

- Corrective actions and corrections, considering the nature of any supplier non-conformance;
- Review of records; and
- Reanalysis.

#### MONITORING

As appropriate to the nature of the preventive control and its role in the facility's food and manufacturing safety system:

Written procedures: Elevation Green LLC shall establish and implement written procedures, including the frequency with which they are to be performed, for monitoring the preventive control; and

Monitoring: Elevation Green LLC shall monitor the preventive controls with adequate frequency to provide assurance that they are consistently performed.

Records:

- Requirement to document monitoring: Elevation Green LLC shall document the monitoring of preventive controls in records that are subject to verification and records review.
- Exception records:
  - Records of refrigeration temperature during storage of food that requires time/temperature control to significantly minimize or prevent the growth of, or toxin production by, pathogens may be affirmative records demonstrating temperature is controlled or exception records demonstrating loss of temperature control.
  - Exception records may be adequate in circumstances other than monitoring of refrigeration temperature.

### CORRECTIVE ACTIONS

Corrective action procedures: As appropriate to the nature of the hazard and the nature of the preventive control, except as provided by paragraph (c) of this section:

- Elevation Green LLC shall establish and implement written corrective action procedures that must be taken if preventive controls are not properly implemented, including procedures to address, as appropriate:
  - The presence of a pathogen or appropriate indicator organism in a ready-to-eat or manufactured product detected as a result of product testing; and
  - The presence of an environmental pathogen or appropriate indicator organism detected through the environmental monitoring conducted.
- The corrective action procedures must describe the steps to be taken to ensure that:
  - Appropriate action is taken to identify and correct a problem that has occurred with implementation of a preventive control;
  - Appropriate action is taken, when necessary, to reduce the likelihood that the problem will recur;
  - All affected food and manufactured products are evaluated for safety; and
  - All affected food and manufactured products are prevented from entering into commerce, if Elevation Green LLC cannot ensure that the affected food is not adulterated, it shall be destroyed as cannabis waste.
- Records. All corrective actions taken must be documented in records. These records are subject to verification and records review.

### BATCH PRODUCTION RECORDS

Elevation Green LLC shall prepare a written batch production record every time a batch of a cannabis product is manufactured. The batch production record shall accurately follow the appropriate master manufacturing protocol, and each step of the protocol shall be performed in the production of the batch. The batch production record shall document complete information relating to the production and control of each batch, including all the following details:

- The UID and the batch or lot number of the finished batch of cannabis product and the UIDs of all cannabis or cannabis products used in the batch.
- The equipment and processing lines used in producing the batch;
- The date and time of the maintenance, cleaning, and sanitizing of the equipment and processing lines used in producing the batch, or a cross-reference to records, such as individual equipment logs, where this information is retained;
- The identification number assigned to each component, packaging, and label used, and, if applicable, to a cannabis product received from another licensee for packaging or labeling as a cannabis product;
- The identity and weight or measure of each component used;
- A statement of the actual yield and a statement of the percentage of expected yield at appropriate phases of processing;
- The actual results obtained during any monitoring operation;
- The results of any testing or examination performed during the batch production, or a cross-reference to such results; and
- Documentation, at the time of performance, of the manufacture of the batch, including:
  - The date on which each step of the master manufacturing protocol was performed; and
  - The initials of the persons performing each step, including:
    - The initials of the person responsible for weighing or measuring each component used in the batch;
    - The initials of the person responsible for verifying the weight or measure of each component used in the batch;
    - The initials of the person responsible for adding the component to the batch; and
    - The initials of the person responsible for verifying the addition of components to the batch.
- Documentation, at the time of performance, of packaging and labeling operations, including:
  - An actual or representative label, or a cross-reference to the physical location of the actual or representative label specified in the master manufacturing record;
  - The expected number of packaging and labels to be used, the actual quantity of the packaging and labels used, and, when label reconciliation is required, reconciliation of any discrepancies between issuance and use of labels; and
  - The results of any tests or examinations conducted on packaged and labeled cannabis products (including repackaged or relabeled cannabis products), or a cross-reference to the physical location of such results.
- Documentation, at the time of performance, that quality control personnel:
  - Reviewed the batch production record;
  - Reviewed all required monitoring operation(s);
  - Reviewed the results of all tests and examinations, including tests and examinations conducted on components, finished batches of cannabis product, and packaged and labeled cannabis products;

- Either approved and released, or rejected, the batch for distribution; and
  - Either approved and released, or rejected, the finished cannabis product, including any repackaged or relabeled cannabis product.
- Documentation, at the time of performance, of any required material review and disposition decision; and
- The Certificate of Analysis issued for the batch by the licensed testing laboratory, which shall be added to the record after regulatory compliance testing has been completed.

The batch production record shall:

- Contain the actual values and observations obtained during monitoring and, as appropriate, during verification activities;
- Be accurate, indelible, and legible;
- Be created concurrently with performance of the activity documented; and
- Be as detailed as necessary to provide a history of work performed; including:
  - Information to identify any associated manufacturing premises (e.g., the name, license number, and the location of the premises);
  - The date and the time of the activity documented;
  - The signature or initials of the person performing the activity; and
  - The identity of the product, the UID, and the batch or lot number.

## WEIGHTS AND MEASURES

Weighing devices used by Elevation Green LLC shall be approved, tested, and sealed in accordance with the requirements in Chapter 5 (commencing with section 12500) of Division 5 of the Business and Professions Code, and registered with the county sealer consistent with Chapter 2 (commencing with section 12240) of Division 5 of the Business and Professions Code. Approved and registered devices shall be used whenever:

- Cannabis or cannabis product is bought or sold by weight or count;
- Cannabis or cannabis product is packaged for sale by weight or count;
- Cannabis or cannabis product is weighed or counted for entry into the track-and-trace system; and
- The weighing device is used for commercial purposes as defined in section 12500 of the Business and Professions Code.

For the purposes of this section, “count” means the numerical count of the individual cannabis product units. Whenever Elevation Green LLC is determining the weight, measure, or count of cannabis and cannabis products for the purposes specified above, the weight, measure, or count shall be determined by a licensed weighmaster as required by Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code. The weighmaster certificate required under section 12711 of the Business and Professions Code shall not be required when cannabis or cannabis products are weighed.

## REQUIREMENTS FOR EDIBLE CANNABIS PRODUCTS

Except for cannabis, cannabis concentrate, or terpenes, no product ingredient or component shall be used in the manufacture of an edible cannabis product unless that ingredient or component is permitted by the United States Food and Drug Administration for use in food or food manufacturing, as specified in Substances Added to Food in the United States, available at <https://www.fda.gov/Food/IngredientsPackagingLabeling/FoodAdditivesIngredients/ucm115326.htm> or is Generally Recognized as Safe (GRAS) under sections 201(s) and 409 of the Federal Food, Drug, and Cosmetic Act (codified in 21 U.S.C 321(s) and 21 U.S.C. 348).

Edible cannabis products that consist of more than a single serving shall be either:

- Scored or delineated to indicate one serving, if the edible cannabis product is in solid form. For purposes of this section, “delineated” includes directly marking the product to indicate one serving or providing a means by which a consumer can accurately identify one serving; or
- If the edible cannabis product is not in solid form, packaged in a manner such that a single serving is readily identifiable or easily measurable.

An edible cannabis product consisting of multiple servings shall be homogenized so that each serving contains the same concentration of THC.

## REQUIREMENTS FOR TOPICAL CANNABIS PRODUCTS, CONCENTRATES, AND OTHER CANNABIS PRODUCTS

Except for cannabis, cannabis concentrate, or terpenes, topical cannabis products shall only contain ingredients permitted for cosmetic manufacturing in accordance with Title 21, Code of Federal Regulations, Part 700, subpart B (section 700.11 et seq.) (Rev. March 2016), which is hereby incorporated by reference.

## CANNABINOID CONCENTRATION LIMITS

- An edible cannabis product shall not contain more than:
  - 10 milligrams THC per serving; and
  - 100 milligrams THC per package.
- A package containing an edible product that is an orally-dissolving product, such as sublingual lozenges or mouth strips, may contain up to 500 milligrams THC per package, if:
  - The cannabis product consists of discrete servings of no more than 10 milligrams THC per piece;
  - The cannabis product is labeled “FOR MEDICAL USE ONLY;” and
  - The cannabis product is only available for sale to a medicinal-use customer.
- A topical cannabis product or a cannabis concentrate shall not contain more than 1,000 milligrams THC per package.
- A topical cannabis product or a cannabis concentrate may contain more than 1,000 milligrams THC per package, but not more than 2,000 milligrams THC per package, if the



product is labeled “FOR MEDICAL USE ONLY” and is only available for sale to a medicinal-use customer.

## PRODUCT COMPLAINTS

Elevation Green LLC shall establish and implement written procedures to ensure that:

- Elevation Green LLC owners shall review and investigate all product complaints to determine whether such complaints involve a possible failure of a cannabis product to meet any of its specifications;
- Quality control personnel shall review and approve decisions determining whether to investigate a product complaint and shall review and approve the findings and follow up action(s) of any investigation performed;
- Any review or investigative activities by qualified individuals and quality control personnel shall extend to all relevant batches and records.
- Quality control personnel shall maintain written records for every product complaint and subsequent investigation, if any. The records shall include:
  - The name and description of the cannabis product;
  - The batch number or UID of the cannabis product, if available;
  - The date the complaint was received and the name, address, and telephone number of the complainant, if available;
  - The nature of the complaint including, if known, how the product was used;
  - The reply to the complainant, if any;
  - The findings of the investigation or follow-up action taken when an investigation is performed; and
  - The basis for any determination not to conduct an investigation.

For purposes of this section, “product complaint” means any written, electronic, or oral communication that contains any allegation expressing concern, for any reason, with the quality of a cannabis product that could be related to the manufacturing practices. Examples of product complaints may include but are not limited to: foul odor, off taste, illness or injury, disintegration time, color variation, foreign material in a cannabis product container, improper packaging, mislabeling, cannabis products that contain an incorrect concentration of cannabinoids, or cannabis products that contain an unidentified ingredient, or any form of contaminant.

## RECALLS

Elevation Green LLC shall establish and implement written procedures for recalling cannabis products manufactured by Elevation Green LLC that are determined to be misbranded or adulterated. These procedures shall include:

- Factors which necessitate a recall;
- Personnel responsible for implementing the recall procedures; and
- Notification protocols, including:

- A mechanism to notify all customers that have, or could have, obtained the product, including communication and outreach via media, as necessary and appropriate;
  - A mechanism to notify any licensees that supplied or received the recalled product;
  - Instructions to the general public and other licensees for the return or destruction of the recalled product.
- Procedures for the collection and destruction of any recalled product. Such procedures shall meet the following requirements:
  - All recalled products that are intended to be destroyed shall be quarantined for a minimum of 72 hours. Elevation Green LLC shall affix to the recalled products any bills of lading, shipping manifests, or other similar documents with product information and weight. The product held in quarantine shall be subject to auditing by the Licensing Agencies.
  - Following the quarantine period, Elevation Green LLC shall render the recalled cannabis product unusable and unrecognizable and dispose of it in accordance with Section 40290, and do so on video surveillance in accordance with Section 40205 of the CDPH Cannabis Manufacturing Regulations.

In addition to the tracking requirements outlined in the Inventory Management Plan, Elevation Green LLC shall use the track-and-trace database and on-site documentation to ensure that recalled cannabis products intended for destruction are identified, weighed, and tracked while on the licensed premises and when disposed of in accordance with this section. For recalled cannabis products, Elevation Green LLC shall enter the following details into the track-and-trace database: the weight and count of the product, reason for destruction, and the date the quarantine period will begin. Elevation Green LLC shall notify the Licensing Agencies of any recall within 24 hours of initiating the recall.

## RELEASE TO DISTRIBUTOR AS FINISHED PRODUCT

Prior to release of a cannabis product to a distributor or Elevation Green LLC's distribution operations, Elevation Green LLC shall ensure that the product is in finished form and is labeled and packaged in its final form for sale. For purposes of this section, "final form" does not include: Labeling of cannabinoid content if the cannabinoid content is to be added to the label at the distribution premises after issuance of the Certificate of Analysis.

# CULTIVATION PLAN

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This Cultivation Plan has been developed for the Elevation Green, LLC, a proposed commercial cannabis business located at 312 Commerce Drive, Units A & B, Mammoth Lakes, CA 93546. This Cultivation Plan outlines standard practices and procedures that will be implemented by Elevation Green, LLC for safe and secure cultivation operations. Cultivation policies and procedures will be compliant with the regulations set forth by the Microbusiness and Cultivation Commercial Cannabis licensing authorities, the Bureau of Cannabis Control (BCC) the Town of Mammoth Lakes (TOML), as well as the California Department of Food and Agriculture (CDFA), California Department of Pesticide Regulation (DPR), the Fertilizing Materials Program which is part of the Feed, Fertilizer, & Livestock Drug Regulatory Services Branch of CDFA, and all applicable state and local laws, regulations, ordinances, and other requirements relevant to the commercial cannabis cultivation. Elevation Green LLC's cultivation operations may occur 24 hours a day, 7 days a week with the exception of receiving of deliveries of non-cannabis goods. Receiving of non-cannabis goods such as growth medium, fertilizers, pesticides, and equipment, shall only occur between the hours of 7am and 10pm as required within the Town of Mammoth Lakes.

## CULTIVATION OPERATIONS SUMMARY

Elevation Green LLC's cultivation operations shall consist of four rooms with plants at different cultivation stages. A Mother Room will house Mother Plants from which to cut clones off of, a Clone Room to propagate clones or seedlings, a Veg Room to develop clones or seedlings to the vegetative phase, and a Mature Canopy/Flower Room for the flowering stage until plant harvest. Artificial lighting will be used in each of the cultivation rooms. Plants will be moved from room to room as they transition to each phase. Flowering plants must be in the Mature Canopy/Flower Room, and not in other cultivation rooms. Flowering plants shall be in pots or bags containing growth medium. While in the flowering stage, leaves may be trimmed to increase airflow and lighting exposure. There will be six 4ft by 8ft trays which will hold 18 pots/bags in each tray, and two 2ft by 8 ft trays which will hold 9 pots/bags in each tray for a total of 126 plants in the Mature Canopy/Flower Room. The Mature Canopy/Flower Room is 435 square feet in size and the mature canopy area is approximately 375 square feet.

Once plants are harvested and weighed, they will then be hung to dry/cure in the Drying and Harvest Storage Room. Any time cuts are made to plants prior to harvest, such as trimming leaves, those materials will be weighed, entered into the Track and Trace system, and disposed of as described in the Waste Management Plan.

Once plants are harvested and cured, they may be processed by bucking the stems and trimming the leaves. The flower portion of the processed plant will be weighed and recorded. The dried stems and leaves will be weighed and disposed of as described in the Waste Management Plan. Whole plants including flower, stems, and leaves may be utilized for producing mechanical extracts instead of being processed. Harvested or processed cannabis

shall then be packaged in bulk for bulk wholesale sales to a manufacturer, packaged temporarily for use in Elevation Green LLC's manufacturing operations, such as making pre-rolls or mechanical extracts, or packaged into final retail-form. Weighing will occur during packaging or prior to transfer of cannabis to Elevation Green LLC's manufacturing operations. Packaging and labeling procedures are outlined in the Packaging and Labeling Plan. Testing shall be completed as described in the Inventory Management Plan prior to final labeling and positioning for distribution to licensed retailers. All cultivation operations shall separate processing for Adult-Use plants and Medical plants, including waste management. Environmental and cultivation procedures are described in further detail below.

### GROWTH MEDIUM

Elevation Green LLC may use several growth mediums for cultivation operations which may include soil, compost, or soilless mediums such as rockwool, perlite, vermiculite, peat moss, and coco coir. The medium(s) selected may be based on the specific cultivar or how well the medium performs through harvests. Growth medium shall be reused whenever possible to reduce waste.

### LIGHTING

This section describes Elevation Green LLC's lighting for the cultivation operations portion of the Microbusiness including the lighting fixtures, bulb types, approximate hours lighting will be utilized, and the estimated watts per square foot for mature canopy.

#### MOTHER ROOM, CLONE ROOM, AND VEG ROOM

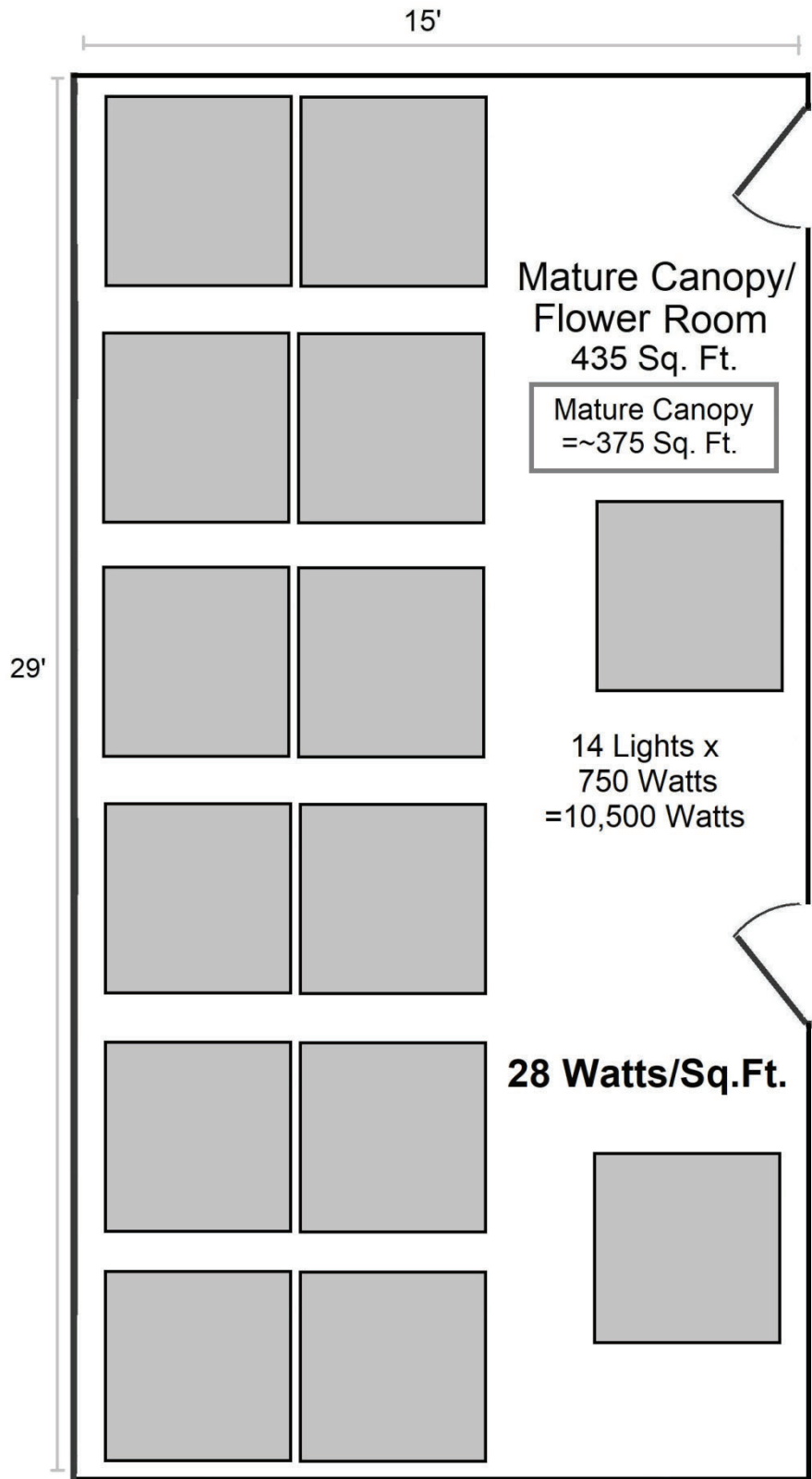
Lighting for the Mother Room, Clone Room, and Veg Rooms will utilize either T5 Fluorescent or Light-emitting diode (LED) lights, or a combination of both. T5 Fluorescent lights are 300 watts per fixture. LED lights are 200 watts per fixture. The number of fixtures in each immature cultivation room will depend on the final layout for each room. Lighting use in these rooms will be up to 18 hours a day. Cultivation of immature cannabis plants requires much less lighting than that of mature plants.

#### MATURE CANOPY/FLOWER ROOM

Lighting for the Mature Canopy/Flower Room will utilize Light-Emitting Diode (LED) lights. Lighting use for mature canopy will be up to 12 hours a day. LED fixtures are 750 watts per fixture. An estimate of one light fixture per 9 mature plants, or 4ft x 4ft of mature canopy area, will be utilized in the Mature Canopy/Flower Room. It's estimated that the Mature Canopy/Flower Room will house 126 mature plants; therefore, 14 light fixtures will be used. For 14 light fixtures, total wattage for the Mature Canopy/Flower Room is 10,500 watts. The Mature Canopy/Flower Room is 435 square feet with an estimated mature canopy area of approximately 375 square feet. Total watts/square foot of mature canopy will be 28 watts/square foot.

**Mature Canopy Total Watts/ Sq. Ft. = 28**

FIGURE 1: MATURE CANOPY LIGHTING DIAGRAM



## ADDITIVES

Fertilizer products to be utilized for cultivation operations are from Athena Products, Inc. Fertilizer products will be mixed by hand in amounts sufficient for each scheduled feeding. The mixed fertilizer will then be applied to the growth medium for clones, mother plants, immature cannabis plants, and mature/flowering cannabis. All fertilizer will be mixed and applied in accordance with the manufacturer's guidelines for the specific product. More information on fertilizer can be found in the Fertilizer Management Plan.

Pest management shall be controlled through integrated pest management methods which utilize preventative, cultural, physical, biological, and chemical measures. Details regarding Elevation Green LLC's pest management practices can be found in the Integrated Pest Management Plan.

## SECURITY

Security measures for Elevation Green LLC's microbusiness operations, including cultivation, are detailed in the Security and Safety Plan.

## ENVIRONMENTAL CONTROLS

### HEATING, VENTILATING, COOLING, AND AIR FILTRATION

Heating, ventilation, cooling, and air filtration will be installed and maintained by a licensed professional and receive routine maintenance, as needed, to ensure proper functioning of all environmental controls installed throughout the Premises. Splits shall be utilized to maintain efficient and isolated temperature controls in cultivation rooms and to prevent indoor/outdoor air exchange. Specifications for the splits will be included in the building permit application. Elevation Green LLC will utilize equipment that adequately controls air temperature and also humidity where cannabis goods will be cultivated and dried/cured. Cultivation rooms are intended to be closed environments to not only control the growth environment, but also to prevent the introduction of pests, mildew, spores, foreign material, etc. that could compromise the integrity and purity of the cultivation operations.

### ODOR CONTROL & AIR FILTRATION

Elevation Green LLC's premises shall be equipped with odor control/filtration systems sufficient to maintain air quality in the premises and prevent any odors associated with Elevation Green LLC's commercial cannabis operations from leaving the premises. Odor control may be accomplished through a variety of methods including carbon filtration, charcoal filtration, in-line filtration, air scrubbers, or other technologies available for odor mitigation. Air filtration will occur in each individual cultivation room constantly utilizing a combination of the equipment (or similar equivalent) described below in the Environmental Control Equipment section. Ongoing air filtration for closed-systems is effective for removing nuisance odors and sanitizing the air, a standard practice in the industry for indoor cultivation of cannabis.

## HUMIDITY CONTROLS

Humidity controls shall be utilized to maintain ideal humidity levels in the cultivation rooms. Adequate water collection and drainage shall be maintained for the humidity control system as to prevent flooding. Humidity controls shall be set and maintained as necessary, according to manufacturer's specifications, in order to control mold or pathogen growth. Humidity shall be maintained lower than 55%, the humidity at which mold begins to grow. No standing water shall be allowed to accumulate in the cultivation rooms, trays, on the floors, etc. Porous materials (other than growth medium) shall not be used in the cultivation rooms in order to prevent moisture from collecting.

## CARBON DIOXIDE

Elevation Green LLC will use supplemental Carbon Dioxide (CO<sub>2</sub>) in the Mature Canopy/Flower Room during periods when lights are on. Supplemental CO<sub>2</sub> will be added to the growing environment utilizing a CO<sub>2</sub> tank and regulator system. While in use, the CO<sub>2</sub> regulator system is set up to automatically release small amounts of CO<sub>2</sub> to maintain levels at a specific ppm while the lights are on. The ideal range for supplemental CO<sub>2</sub> in the mature cultivation environment is 800 to 1,500 ppm when lights are on, but often depends on the specific cultivar (or strain). The CO<sub>2</sub> system will be set up to automatically maintain CO<sub>2</sub> levels at the desired range while lights are on, and then turn off when the lights are turned off. A carbon dioxide monitor and detector shall be installed where supplemental carbon dioxide is added for cultivation operations. The carbon dioxide detection system is designed to provide an alert when carbon dioxide levels are close to exceeding safe levels, 3,000 ppm. The detection system is in place as a secondary safety measure in the event the supplemental carbon dioxide system regulating and monitoring controls fail for any reason.

## ENVIRONMENTAL CONTROL EQUIPMENT

The following equipment, or similar equivalent, shall be utilized to maintain environmental controls in the cultivation areas:

### CO<sub>2</sub> SYSTEM

Titan Controls CO2 Regulator HG702710

<https://www.titancontrols.net/shop/product/titan-controls-co2-regulator>

Spartan CO2 Controller/Monitor HGC702025

<https://www.titancontrols.net/shop/product/titan-controls-spartan-series-co2-controller-monitor>

### DEHUMIDIFIERS

Quest 165 Dual Dehumidifier #4037410

<https://www.questclimate.com/product/quest-dual-165/>

Ideal-Air Dehumidifier 700828

<https://www.ideal-air.com/shop/product/ideal-air-dehumidifiers-30-50-and-70-pint>

### IN-ROOM AIR FILTRATION

Agriair 1000 Air Purifier – IO Generator, Filter, and Sanitizer

<http://agriairequipment.com/air-purifiers/agriair-1000-air-purifiers/>



Active Air fans and filters

<https://growershouse.com/active-air-12-inline-duct-fan-carbon-filter-combo-12x39>

## WATER MANAGEMENT

Potable water is supplied to the premises from the Mammoth Community Water District's municipal water system. The majority of water use in the Microbusiness operations will be for cultivation operations, specifically watering plants. Plants will require watering and feeding throughout their lifecycle, with water needs increasing with plant growth.

Elevation Green LLC will store water in relatively small amounts to easily facilitate watering and feeding cycles. Water storage for watering will be in a 55 gallon drum in the Mature Canopy/Flower Room as shown on the Premises Map. Water from the 55 gallon drum will water both mature plants in the Mature Canopy/Flower Room and immature plants in the Veg Room. Water storage for feeding purposes will be in a 150 gallon tank located in Unit B as shown on the Premises Map. The drum and tank are each equipped with an automated valve to fill the drum and shut off the valve when it is full. The 55 gallon drum and 150 gallon tank will be equipped with automated pH management systems to maintain a consistent pH for the water stored. Nutrients will be hand mixed into the 150 gallon tank in Unit B for feeding.

Water from the drum and tank will be fed through water lines to the cultivation rooms and watering and feeding will occur through a series of valves. Watering and feeding will be accomplished through drip systems that water and feed directly onto the growth medium in small amounts slowly. Estimated water needs for watering and feeding mature plants are 3 gallons per plant per week. With 126 mature plants, water needs will be approximately 378 gallons per week for mature plants. Less water is needed for plants in the veg phase and for mother plants, typically 2 gallons per plant per week or less, with 126 plants in the Veg Room, and up to 4 in the Mother Room, that's approximately 260 gallons per week for plants in the veg phase and mother plants. Clones and seedlings require much less water, up to 8-16 oz per week per plant, roughly 9 gallons per week for clones and seedlings. Watering and feeding for clones and seedlings will be done by hand. A summary of weekly water use for cultivation watering and feeding is shown below in Table 1.

**TABLE 1: ESTIMATED WEEKLY WATER USE**

PLANT PHASE	GALLONS PER WEEK
Clones & Seedlings	9
Immature Plants	260
Mature/Flowering Plants	378
<b>TOTAL</b>	<b>647</b>

Watering and feeding during cultivation operations is not expected to produce much excess water since a drip watering system will be utilized and automated as to not oversaturate the growth medium and produce excess water drainage. The majority of wastewater produced by Elevation Green LLC as part of the cultivation processes will be from cleaning after each harvest

or moving plants to a new room as they reach the next growing phase. The cultivation areas shall be kept clean at all times by sweeping excess dirt and wiping up spills. Cleaning of each of the cultivation rooms shall be done by sweeping, vacuuming, and then wet mopping. Equipment such as grow trays will go through the same process of sweeping out dirt, vacuuming, then wet cleaning. These procedures will keep debris from being put down the drain and into the wastewater system. Cleaning products used shall be those approved for cleaning lightly soiled industrial equipment and not hazardous for disposal at the wastewater treatment facility. Use of cleaning products shall follow the manufacturer's instructions. Wastewater is disposed of in the premises through drains connected to the wastewater treatment facility at the Mammoth Community Water District.

## ENERGY MANAGEMENT PROGRAM

Electricity for the premises is provided by Southern California Edison. Propane is provided to the premises from a propane tank located outside, which is filled as needed. Elevation Green LLC strives to minimize its impact on the environment. As such, Elevation Green LLC shall implement energy conservation measures for improvements made to the premises. Elevation Green LLC's preferable energy management program would include, but not be limited to, utilizing:

- Automated HVAC controls.
- Automated interior and exterior lighting controls.
- Energy efficient lighting throughout the premises by utilizing energy efficient fixtures and LED lighting. See the lighting plan for more details of lighting used in cultivation operations.
- Motion and sound detection lighting controls.
- Clean burn technology in all heating units.
- Preventative maintenance programs designed to ensure installed technology will be operating at peak performance.
- For operations that require high energy uses, such as lighting in the cultivation flower room, these operations will be scheduled outside of peak energy demand periods
- Investigating energy savings that could be realized by replacing equipment or by upgrading systems.
- Targeting and implementing opportunities to save energy.
- Tracking progress by analyzing meter data to determine if energy-saving efforts have provided savings.

The majority of energy consumption for the Microbusiness will be from cultivation operations. Elevation Green LLC will use LED lights for mature canopy cultivation lighting, which not only reduces the energy needs for lights, but also reduces cooling requirements. LEDs operate at much cooler temperatures than other cultivation lights such as High Pressure Sodium (HPS) lights, which require more energy for use and produce a lot of heat, which in turn, requires even more energy for cooling. LEDs have been selected to reduce overall energy consumption. Cultivation lighting is set on timers to turn on and off on its own. Elevation Green LLC shall schedule cultivation lighting periods outside of peak usage times as to not increase overall

energy demand on the grid. Other components that use electricity and propane, such as heaters, fans, filtration systems, the supplemental CO<sub>2</sub> system, and humidity control systems shall be of the latest technology to provide for the greatest energy efficiency.

## WEIGHTS AND MEASURES

Weighing devices used by Elevation Green LLC shall be approved, tested, and sealed in accordance with the requirements in Chapter 5 (commencing with section 12500) of Division 5 of the Business and Professions Code, and registered with the county sealer consistent with Chapter 2 (commencing with section 12240) of Division 5 of the Business and Professions Code. Approved and registered devices shall be used whenever:

- Cannabis or cannabis product is bought or sold by weight or count;
- Cannabis or cannabis product is packaged for sale by weight or count;
- Cannabis or cannabis product is weighed or counted for entry into the track-and-trace system; and
- The weighing device is used for commercial purposes as defined in section 12500 of the Business and Professions Code.

For the purposes of this section, “count” means the numerical count of the individual cannabis product units. Whenever Elevation Green LLC is determining the weight, measure, or count of cannabis and cannabis products for the purposes specified above, the weight, measure, or count shall be determined by a licensed weighmaster as required by Chapter 7 (commencing with section 12700) of Division 5 of the Business and Professions Code. The weighmaster certificate required under section 12711 of the Business and Professions Code shall not be required when cannabis or cannabis products are weighed.

## QUALITY CONTROL, INVENTORY, TESTING, PACKAGING, AND LABELING

Quality Control measures for Elevation Green’s Microbusiness operations including cultivation are detailed in the Quality Control Plan. Inventory management and testing procedures, including Track and Trace processes are detailed in the Inventory Management Plan. Packaging and Labeling procedures are described in the Packaging and Labeling Plan.

## WHOLESALE SALES

Elevation Green LLC’s distribution operations will conduct wholesale sales of Elevation Green LLC’s harvested cannabis, processed cannabis, packaged non-manufactured cannabis goods, and pre-rolls. In addition to the transfer manifest, the following information shall be included in Elevation Green LLC’s sales invoices for wholesale sales of cultivated cannabis:

- Name, business address, department or other licensing authority issued license number of the seller & purchaser
- Date of sale or transfer (the date the licensee receives it)
- Invoice or receipt number

## CULTIVATION PLAN

- Weight or quantity of cannabis sold or transferred (wet or net weight)
- Wholesale cost to purchaser including any discounts applied to the total price
- Description for each item including strain or cultivar, and:
  - Plant, flower, kief, shake, leaf, pre-rolls
  - If cannabis is Adult-Use or Medical
- Cultivation taxes to be collected
- Signature of seller and purchaser

More information regarding Elevation Green LLC's distribution operations, including wholesale sales, can be found in the Distribution Plan.