PANTHER CANYON INVESTMENTS, LLC
CULTIVATION AND OPERATIONS MANUAL
HUMBOLDT COUNTY, CA

PROPOSED COMMERCIAL CANNABIS
CULTIVATION FACILITIES

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PREPARED FOR:

April 2020
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Cultivation and Operations Manual
For
Panther Canyon Investments, LLC

Apps. #: 12441/12442
APN: 223-061-041, 223-074-008

Proposed Commercial Cannabis Cultivation Facilities

Lead Agency:
Humboldt County Planning Department
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1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

Panther Canyon Investments, LLC is proposing to permit existing cannabis cultivation activities in accordance with the County of Humboldt's (County) Commercial Medical Marijuana Land Use Ordinance (CMMLUO). The project requires a Conditional Use Permit (CUP) for approximately 29,200 sq. ft. of outdoor cultivation on APNs 223-061-041 and 223-074-008. The project includes the permitting of existing and proposed facilities appurtenant to the cultivation, including a building for drying and storage and appropriate water storage. The applicant aims to become fully compliant with State and Local cultivation regulations.

Historically, two separate cannabis cultivation applications were submitted to the Humboldt County Planning Department for each of the two APNs (County APPS # 12441 and #12442), however, a Determination of Status completed by Humboldt County determined that the two APNs are technically one legal parcel (DoS #17-003). Therefore, the applications are proposed to be merged together into a single application.

Pre-2016 verified cultivation was a total of 29,860 sq. ft., including 23,860 sq. ft. of outdoor and 6,276 sq. ft. of mixed light. The applicant is electing to reduce square footage and reduce intensity of cultivation to 29,200 sq. ft. of outdoor canopy area.

1.2. SITE DESCRIPTION

The Project Site is located on a private driveway off of Sprowl Creek Road, northeast of the locality of Benbow, CA (APNs 223-074-008 and 223-061-041) in the Lower East Branch South Fork Eel River HUC 12 Watershed. The two APNs are legally one 160-acre parcel, per the Determination of Status completed for the property (DS 17-003). The parcel has undulating topography with slopes variable between 5% and greater than 30%. An intermittent stream flows southerly through the northeast corner of the property toward the South Fork of the Eel River. No other ephemeral drainages were located in a site investigation, as the cultivation is located on a ridge top. Project Site vegetation consists of mixed oak woodlands, manzanitas, and mixed conifer and deciduous forest. There are no mapped Prime Agricultural Soils or Wetlands located on the property.

An existing 45' x 35' wood structure for drying, curing, and storage is located near the primary cultivation location. Existing cultivation infrastructure, including hoop houses, soil, soil bags, etc., exists on the property. There are no onsite residences or other onsite structures.

1.3. LAND USE

The subject property has a General Plan designation of Agricultural Grazing (AG) as identified by the Humboldt County General Plan and is primarily zoned Timber Production Zone (TPZ), with a small Agriculture Exclusive (AE-B-5-160) zoning designation in the northeast corner of the parcel. Land uses surrounding the parcel are comprised of agriculture, timber, and scattered rural residences. The surrounding parcels are zoned Agricultural Exclusive (AE), Agriculture General (AG) and Timber Production Zone (TPZ).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

Panther Canyon Investments, LLC will secure cannabis cultivation licenses through the Department of Cannabis Control (CC) upon local approval.

1.4.2. State Water Resources Control Board – Water Rights

Water for cannabis cultivation will be provided by rainwater catchment. Therefore, water rights are not required to be filed with the State Water Resources Control Board.

1.4.3. North Coast Regional Water Quality Control Board and State Water Resources Control Board – Water Quality

Currently, no cultivation activities are occurring onsite and no activities occurred in 2019. Prior to commencing cultivation activities, Journey Aquarian of Panther Canyon Investments will apply for coverage under the State Water Resources Control Board (SWRCB) General Order WQ 2019-0001-DWQ *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities*. A Site Management Plan will be completed within 90 days of enrollment, per the General Order. The Site Management Plan (SMP) will detail how the site complies with the Best Practicable Treatment or Control Measures of the Cannabis General Order per Attachment A.

1.4.4. Humboldt County Building Department

All necessary building permits will be obtained from the Humboldt County Building Department for all existing and proposed structures and supporting infrastructure upon approval of the Conditional Use Permit.

1.4.5. Cal Fire

The subject property is located within a State Responsibility Area (SRA) for fire protection. Several improvements are proposed in order to meet SRA requirements, including designating a fire turn-around and pull-out area for emergency vehicles, and management of trees and vegetation around existing structures to maintain the required 100-foot defensible space. All structures on the property meet the 30-foot SRA setback requirement from property lines. If required by Cal Fire, a 2,500-gallon water tank with a riser to SRA specifications will be installed for firefighting purposes.

1.4.6. California Department of Fish and Wildlife

There are no onsite stream crossings, ponds, or points of diversion. A Lake and Streambed Alteration Notification (1600 permit) for no jurisdictional items will be submitted to the California Department of Fish and Wildlife.

1.4.7. Cultural Resources

If buried archaeological or historical resources are encountered during construction or cultivation activities, the applicant or contractor shall call all work in the immediate area to halt temporarily, and a qualified archaeologist is to be contacted to evaluate the materials. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, dietary bone, and human burials. If human burial is found during construction, state law requires that the County Coroner be contacted immediately. If the remains are found to be those of a Native American, the California Native American Heritage Commission will then be contacted by the Coroner to determine appropriate treatment of the remains. The applicant is ultimately responsible for ensuring compliance with this condition.

2. CULTIVATION AND PROCESSING

2.1. Legacy Cultivation and Relocation

Across the two parcels (APNs 223-074-008 and 223-061-041), 29,860 sq. ft. of cannabis cultivation existed on the property prior to 2016, according to two Cultivation Area Verifications prepared by the Humboldt County Planning Department (#s12441, 12442). The 29,860 sq. ft. of cultivation was located in numerous cultivation areas scattered across both parcels. Many of these historic cultivation areas were located on steeper slopes of greater than 30% and/or have no road access and are proposed to be relocated to the main cultivation flat. The poorly-sited past cultivation is proposed to be relocated onto the existing flat roadway in outdoor pots near the existing hoop houses (see accompanying restoration plan and plot plan for details). Relocating the cultivation onto the existing roadway is easily accessible via a gravel road, thus reducing the erosion potential of trekking downhill to inaccessible historic cultivation areas. Thus, relocating the cultivation is proposed as an environmentally superior option. All relocation areas are already disturbed. All relocated cultivation areas will be restored, and all cultivation-related materials will be removed and properly reused or disposed of at a licensed facility.

2.2. Propagation and Cultivation

Outdoor plants are proposed to be cultivated using full-sun and light-deprivation outdoor cultivation techniques. Juvenile plants will either be sourced from onsite mother plants or purchased from a licensed commercial nursery. The juvenile plants will be irrigated using a combination of drip emitters and hand watering methods. After 2-4 weeks the clones are then transplanted into 20-gallon smart pots with a soil and perlite medium and moved into the full-sun outdoor cultivation area or into light-deprivation hoop houses where they continue their 'vegetative' cycle and eventually flower. Light deprivation is achieved by strategically pulling tarps over the hoop houses to manipulate light during certain times of year. The full-sun outdoor cultivation is expected to produce one (1) flowering cycle per year and the light-deprivation outdoor cultivation is expected to produce two (2) flowering cycles per year. The monthly Cultivation Schedule in Appendix B details the timeline of activities associated with all cultivation.

2.3. Irrigation Plan and Schedule

Irrigation and fertigation of plants occurs using drip irrigation and some top-feed hand watering methods as appropriate. While most irrigation needs are on automatic drip, some irrigation and fertigation is more efficiently managed via hand watering, allowing for daily inspection of each plant by the cultivator and tailored irrigation and nutrient application depending on the needs of each individual plant. The monthly Cultivation Schedule in Appendix B details the irrigation activities associated with all cultivation.

2.4. Harvesting, Drying, and Trimming

Plants that are ready for harvest have their flowering branches removed and suspended in the existing drying building which is equipped with ventilation fans. The drying process takes approximately one week.

The dried flowers are then bucked into manageable buds and transported to an off-site processing facility for further trimming, packaging, and distribution.

2.5. Employee Plan

Panther Canyon Investments, LLC is an "agricultural employer" as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 (commencing with Section 1140) of

Division 2 of the Labor Code), and complies with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

2.5.1. Job Descriptions And Employee Summary

- *Agent in Charge*: Responsible for business oversight and management. Responsibilities include, but are not limited to: inventory and tracking, personnel management, record keeping, budget, and liaison with State and County inspectors as needed. This is a part-time to full-time, seasonal position.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical cannabis. Responsibilities include but are not limited to: plant propagation and transplant, soil management, irrigation, fertilization, pesticide management, and harvest activities. This is a full-time, year-round position.
- Seasonal Laborer: Provides cultivation, harvesting, and drying support. This is a part-time to full-time, seasonal position.

2.5.2. Staffing Requirements

In addition to the *Agent in Charge* and *Lead Cultivator* positions, up to three (3) full-time seasonal labor positions are employed. The number of seasonal laborers varies based on the needs of the farm during the cultivation, harvest and processing seasons. During the peak harvest and processing season, there are an estimated total of five (5) employees on site.

2.5.3. Employee Training and Safety

On site cultivation, harvesting and drying is performed by employees trained on each aspect of the procedure including: cultivation and harvesting techniques and use of pruning tools; proper application and storage of pesticides and fertilizers. All cultivation staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation and drying facilities are limited to authorized and trained staff.

All employees are trained on proper safety procedure including fire safety; use of rubber gloves and respirators; proper hand washing guidelines; and protocol in the event of an emergency. Contact information for the local fire department, CAL FIRE, Humboldt County Sheriff and Poison Control as well as the Agent in Charge will be posted at the employee restroom. Each employee is provided with a written copy of emergency procedures and contact information. The material safety data sheets (MSDS) are kept on site and accessible to employees.

2.5.4. Toilet and Handwashing Facilities

No septic system currently exists onsite. Employees will utilize portable toilets, which will be regularly serviced as required by a qualified professional. Anti-bacterial Liquid Soap and paper hand towels will be made available. Employees will work at a distance typically no greater than 500 feet from the portable toilets.

2.5.5. Housing

No residences exist on the property. All employees will commute to the work site from off-site locations. Carpooling will be encouraged when possible.

2.6. Security Plan and Hours of Operation

2.6.1. Facility Security

Multiple entry gates leading to the cultivation are located on the driveway off Sprowel Creek Road. The entry gates remain locked at all times and access to the cultivation area is limited exclusively to employees. The site is not proposed to be accessible to the general public.

2.6.2. Hours of Operation

Activities associated with cultivation (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as harvesting and drying typically occur no earlier than 8 AM and extend no later than 8 PM.

3. ENVIRONMENT

3.1. Water Source and Projected Water Use

Water for cannabis cultivation uses will be provided by rainwater catchment. There is an existing groundwater well onsite, however this is not proposed as a water source for cannabis any longer. No points of diversion exist onsite.

At 10 gallons per square foot, the 29,000 sq. ft. of cultivation would require approximately 290,000 gallons of water. Table 1 below outlines the estimated irrigation water usage for cultivation during a typical year. Variables such as weather conditions and specific cannabis strains will have a slight effect on water use.

Table 1: Estimated Annual Irrigation Water Usage (Gallons)

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	0	13,000	28,000	47,000	62,000	59,000	54,000	27,000	0	0

3.2. Water Storage

This site currently has 17,000 gallons of storage in the form of plastic water tanks: four (4) 3,000-gallon tanks and one (1) 5,000-gallon tank. All water tanks are currently located near the entry gate. An additional 55 x 5,000-gallon tanks, or 275,000 gallons of storage are proposed. rainwater catchment tanks would be 5,000-gallons in capacity, and would have the ability to capture water.

3.1. Rainwater Catchment Analysis

As discussed above, the water source for the proposed project is rainwater catchment. This section details how much rainwater can be captured and stored on the project site for the proposed project build-out.

Water storage tanks will be plumbed to catchment surfaces (the existing 35’ x 45’ barn, two greenhouses, and tanks) to collect and store rainwater for use during the dry period. Table 2 provides a summary of the potential rainwater harvest volume for an average rainfall year.

Precipitation depth data for the project area was obtained from PRISM and used to calculate an average annual rainfall depth of 55.95 inches over the last approximately 22 years (1990-2021). To obtain the volume of the water that reaches the catchment area, the average rainfall depth was multiplied by the catchment surface area, and multiplied by the capture efficiency, as shown in Equation 1. Tanks were assumed to have a 12’ diameter. The capture efficiency of the barn and

greenhouse catchment surfaces were estimated to be approximately 95% due to potential breaks in the guttering or other unforeseen complications. Capture efficiency of the tanks was assumed to be 100%.

$$Equation\ 1: Harvested\ Rainwater\ (gal.) = catchment\ area\ (sq.ft.)\ x\ annual\ precipitation\ (in.)\ x\ 0.623\ conversion\ factor\ x\ capture\ efficiency\ (\%)$$

To prepare for the changing climate, it is important to also analyze rainfall collection potential during a drought year. The lowest 5 years of precipitation from 2000-2022 per PRISM data (Appendix C) average out to 34.62 inches of precipitation, representing the average drought rainfall year.

As shown in Tables 2 and 3, the existing and proposed catchment surfaces would be sufficient catchment surfaces to catch greater than 290,000 gallons in both an average and drought rainfall year. During an average rainfall year, harvest volumes from rainwater could total up to 497,275 gallons, and during a drought rainfall year, harvest volumes from rainwater collection could total up to 307,700 gallons.

Table 2: Rainwater Catchment Surfaces and Harvest Volumes for an Average Rainfall Year

Catchment Surface	**Catchment Area (ft^2)**	**Average Annual Rainfall (in.)**	**Rainfall Capture Potential (gal)**	**Adjusted Rainfall Capture Potential (gal)**
Existing 35’ x 45’ Barn	1,575	55.95	54,900	52,154
55 x 5,000-gallon Rainwater Catchment Tanks	6,215	55.95	216,635	216,635
120’ x 30’ Greenhouse	3,600	55.95	125,485	119,210
110’ x 30’ Greenhouse	3,300	55.95	115,028	109,276
Total				**497,275**

Table 3: Rainwater Catchment Surfaces and Harvest Volumes for a Drought Rainfall Year

Catchment Surface	**Catchment Area (ft^2)**	**Drought Annual Rainfall (in.)**	**Rainfall Capture Potential (gal)**	**Adjusted Rainfall Capture Potential (gal)**
Existing 35’ x 45’ Barn	1,575	34.62	33,970	32,272
55 x 5,000-gallon Rainwater Catchment Tanks	6,215	34.62	134,047	134,047
120’ x 30’ Greenhouse	3,600	34.62	77,646	73,764
110’ x 30’ Greenhouse	3,300	34.62	71,175	67,617
Total				**307,700**

3.2. Site Drainage, Runoff, and Erosion Control

Journey Aquarian of Panther Canyon Investments, LLC has enrolled for Tier 1, Low Risk coverage under the General Order. A Site Management Plan is currently being created and will be submitted to the State Water Resources Control Board within 90 days of the enrollment date. Further details regarding site drainage and runoff, erosion control, sediment prevention, and riparian protection will be detailed in the forthcoming Site Management Plan. The SMP will discuss how the site is in compliance with the Best Practicable Treatment and Control Measures (BPTC Measures) detailed in Attachment A of the General Order.

3.3. Monitoring and Reporting

Monitoring will be conducted to confirm the effectiveness of corrected measures listed in the SMPSMP and determine if the site meets all of the BPTC Measures in Attachment A of the Order. Journey Aquarian will track all water diversion and use and records fertilizer applications. This information will be reported to the State Water Resources Control Board in the Annual Report, due annually by March 1st.

3.4. Energy and Generator Use

Generator are used for on-site power of the dry building. There are no current generators onsite, as the site is not currently cultivating. The exact specification of generator has not yet been determined. Use of the generator will follow all guidelines set up by Humboldt County and the State of California. The generator is located away from the property line to ensure the noise level does not exceed 60 decibels at the property line. The generator and diesel fuel are located within a secondary containment trough. No processing would occur onsite. Product could also be fresh frozen and not dried onsite, reducing power demand.

3.5. Use and Storage of Regulated Products

3.5.1. Best Management Practices

Best Management Practices (BMP's) and Best Practicable Treatment and Control (BPTC) Measures are employed when storing, handling, mixing, applying and disposing of all fertilizers, pesticides and fungicides. All nutrients, pesticides and fungicides are located in a locked storage room, and contained within watertight, locked and labeled containers in accordance with manufactures instruction. Application rates will be tracked and reported with the end of the year monitoring report as detailed in the SMP. Employees responsible for application are trained to handle, mix, apply or dispose of pesticides/fungicides with proper hand, eye body and respiratory protection in accordance with the manufacturer's recommendations. See the SMP for more details.

3.5.2. Fertilizers

Nutrients and biological inoculants used for cultivation include:

- Sparetime Mocha Bat Guano
- Stutzman Chicken Manure (3-2-2)
- Sparetime Fossilized Seabird Guano (0-6-0)
- Azomite - trace minerals
- Diatomaceous Earth
- Calcium Phosphate Tribasic
- Earth Juice Rainbow Mix Grow (8-6-3)
- Dr. Earth Premium Gold All-Purpose Fertilizer (4-4-4)
- Green Gro Nature's Pride Veg (6-3-3.5)

- Molasses
- Age Old Bloom (3-20-20)
- Age Old Gro (12-6-6)
- Soluble Humic Acid

3.5.3. Pesticides and Fungicides

Pesticides and fungicides used for cultivation include:

- Neem Oil
  - http://www.gardensafe.com/Products/Fungicide/Neem-Oil-Extract-Concentrate.aspx

3.5.4. Fuels and Oils

Fuels and oils stored on site include:

- Gasoline – 10 Gallons
- Diesel – 10 Gallons

3.6. Waste Management Plan

3.6.1. Solid Waste Management

Trash and recycling containers will be brought onsite to contain refuse generated by future cultivation activities. The recycling containers will be located near the existing building, enclosed within a secure area to prevent animal intrusion. Solid waste and recycling will be hauled off-site to the Eel River Resource Recovery's transfer station in Redway, CA as-needed, likely every other week or monthly.

3.6.2. Cultivation Waste and Soil Management

Cultivation vegetative matter such as root balls, branches, and leaves will be composted at a designated area. Spent potting soil will be stored in a designated contained covered area that is lined to prevent any soil erosion or nutrient seepage. Usable soils will be amended for use the following year. Used pots will be collected and stored in the metal building for the winter. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate facility.

3.6.3. Wastewater Management

The water management plan aims to achieve an entirely closed-cycle irrigation and nutrient system. Hand watering and drip irrigation methods minimize the over-irrigation of plants and subsequent runoff.

4. PRODUCT MANAGEMENT

4.1. Product Testing and Labeling

Once operational, samples will be selected from individual harvested cannabis strains and will be tested by a licensed third-party lab in accordance with State and local standards.

4.2. Product Inventory and Tracking

Journey Aquarian of Panther Canyon Investments, LLC will enroll in the California Cannabis Track & Trace (CCTT) METRC program and comply with all METRC regulations after a state cultivation license is granted from the California Department of Food and Agriculture.

4.3. Transportation and Distribution

Transportation will be handled by a licensed transporter/distributer in accordance with State and Local regulations. All merchantable product will be distributed through licensed medical cannabis dispensaries. Prior to moving packages from the on-site holding facility to another physical location, a transport manifest will be created by the distributer/transporter and will include:

- Product ID numbers and product weight
- Route to be travelled
- Origin and destination addresses
- Time of departure
- Time of arrival

The *Agent in Charge* and the *Processing Manager* are responsible for performing a physical inventory of all packages being transported and ensuring that the physical inventory coincides with the transport manifest. Journey Aquarian is enrolled in the California Cannabis Track & Trace (CCTT) METRC program and complies with all METRC regulations.

Appendix A: Site Plan

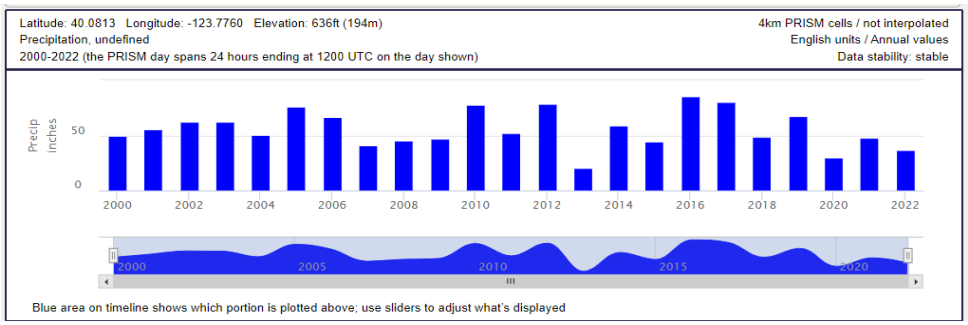
Appendix B: Cultivation Activities Schedule

Item	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Drainage, Runoff, and Erosion Control	Winterization (storage of pots/greenhouse covers)												
	Temporary Erosion Control BMP's (straw, seeding, fiber rolls, etc.)												
	Road maintenance												
	Culvert and inboard ditch maintenance/inspection												
	Cover soil beds and seed / straw with cover crop												
Irrigation Activities	Irrigation of juvenile plants/clones												
	Irrigation of flowering plants												
Pre-cultivation Activities	Transplant clones into beds												
	Amend soil in beds												
	Import new cultivation soil												
Outdoor Cultivation and Harvest Schedule	Outdoor Cultivation Cycle												
	Harvest activities												
	Drying Activities												

Appendix C: PRISM Data

PRISM Time Series Data
Location: Lat: 40.0813 Lon: -123.7760 Elev: 636ft
Climate variable: ppt
Spatial resolution: 4km
Period: 2000 - 2022
Dataset: AN81m
PRISM day definition: 24 hours ending at 1200 UTC on the day shown
Grid Cell Interpolation: Off
Time series generated: 2024-Jan-16
Details: http://www.prism.oregonstate.edu/documents/PRISM_datasets.pdf

Date	ppt (inches)
2000	49.34
2001	55.76
2002	62.55
2003	62.1
2004	50.41
2005	76.26
2006	66.45
2007	41.08
2008	45.01
2009	46.64
2010	78.14
2011	52.15
2012	78.62
2013	20.12
2014	59.36
2015	44.58
2016	85.68
2017	80.41
2018	49.05
2019	67.72
2020	30.26
2021	48.19
2022	37.07



Average Rainfall (in.) - Average annual precipitation since 2000
55.95435

Drought Rainfall (in.) - Average of 5 lowest years on record
34.62

Appendix D: References

California Code of Regulations. Health and Safety Code Section 11357-11362.9. <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=11001-12000&file=11357-11362.9.>

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