

**PUNTA CANNA, LLC
CULTIVATION AND OPERATIONS MANUAL
HUMBOLDT COUNTY, CA**

**PROPOSED CANNABIS
CULTIVATION FACILITIES**



PREPARED FOR:



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**Cultivation and Operations Manual
For
Punta Canna, LLC
APPS#11915**

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TABLE OF CONTENTS

1. PROJECT SUMMARY 1-1

 1.1. Project Objective 1-1

 1.2. Site Description..... 1-1

 1.3. Land Use 1-1

 1.4. State and Local Compliance..... 1-1

2. CULTIVATION AND PROCESSING 2-2

 2.1. Propagation and Initial Transplant 2-2

 2.2. Cultivation Plan and Schedule 2-2

 2.3. Irrigation Plan and Schedule 2-2

 2.4. Harvesting and Drying 2-3

 2.5. Processing Facility..... 2-3

 2.6. Employee Plan 2-3

 2.7. Security Plan and Hours of Operation 2-4

3. ENVIRONMENT..... 3-4

 3.1. Water Source and Projected Water Use..... 3-4

 3.2. Water Storage..... 3-4

 3.3. Site Drainage, Runoff, and Erosion Control 3-5

 3.4. Watershed and Habitat Protection..... 3-5

 3.5. Monitoring and Reporting 3-6

 3.6. Energy and Generator Use 3-6

 3.7. Use and Storage of Regulated Products 3-6

 3.8. Waste Management Plan 3-6

4. PRODUCT MANAGEMENT..... 4-7

 4.1. Product Testing and Labeling 4-7

 4.2. Product Inventory and Tracking 4-7

 4.3. Transportation and Distribution 4-7

APPENDICES

Appendix A: Plot Plan

Appendix B: References

1. PROJECT SUMMARY

1.1. PROJECT OBJECTIVE

PUNTA CANNA, 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 20,555 square feet (sf) of outdoor cultivation. The applicant is currently cultivating 16,130 sf of outdoor cultivation in greenhouses. The project includes a proposed Lot Line Adjustment, which would increase the cultivation to 20,555 sf per applicant's Cultivation Area Verification. The applicant aims to become fully compliant with State and Local cultivation regulations.

1.2. SITE DESCRIPTION

The Project is located at 22681 Alderpoint RD. Alderpoint, CA 95511, on APN 216-317-006. The site is located within the Dobbyn Creek watershed, a tributary to the Eel River. The Eel River is federally designated as a Wild and Scenic River. The Eel River is home to anadromous fish species, including steelhead, chinook, coho and sea-run cutthroat trout. Parcel number 216-317-006 is located alongside North Fork Dobbyn Creek, and measures approximately 21 acres.

The Project Site contains a mixture of grassland, riparian floodplain and terraces, and forested lands with hardwood species including tanoak, oak, Douglas Fir and other coniferous species covering approximately 50% of the remaining lands. The climate is characterized by hot dry summers, and cool mild winters.

1.3. LAND USE

The subject property has a General Plan designation of AG as identified by the Humboldt County General Plan and is zoned Unclassified (U). The surrounding parcels are zoned Agricultural Exclusive (AE) and Timber Production Zone (TPZ).

1.4. STATE AND LOCAL COMPLIANCE

1.4.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

PUNTA CANNA, LLC has obtained a Provisional Commercial Cannabis Activity license from California Department of Food and Agriculture (License Number CCL20-0000597).

1.4.2. NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

PUNTA CANNA, LLC enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) for coverage under Tier 2 of Order No. 2015-0023 *Waiver of Waste Discharge (WOWD) Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region*.

Following this, PUNTA CANNA, LLC transitioned to coverage under the State Water Resources Control Board General Order WQ 2019-0001-DWQ General Waste Discharge Requirements and Waiver of Discharge Requirements for Dischargers of Waste Associated with Cannabis Cultivation Activities. The transition occurred prior to July 1, 2019. Additionally, a Site Management Plan was developed by NorthPoint Consulting and has been furnished to the North Coast Regional Water Quality Control Board (WDID: 1_12CC428278).

1.4.3. 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 (CUP).

1.4.4. 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, a 2,500-gallon water tank with a riser to SRA specifications will be installed for firefighting purposes.

1.4.5. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

A Lake and Streambed Alteration Agreement (LSAA) from the Department of Fish and Wildlife (DFW) has been applied for to cover the point of diversion utilized for the Project Site.

1.4.6. 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, ground stone 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. PROPAGATION AND INITIAL TRANSPLANT

The applicant is proposing to construct a 2,000-sf greenhouse for nursery activities. Juvenile plants are propagated on site from 'mother plants' that demonstrate the desired genetics for the specific cannabis strain. Mother plants remain in the vegetative stage solely for propagation. Cuttings are sampled from the mother plants and are rooted into a growing medium, typically oasis cubes, to produce 'clones.' The clones are placed into the nursery, and once fully rooted they are transplanted directly into 4" smart pots (see Appendix A for nursery location). The juvenile plants are irrigated using hand watering methods. The clones are then transplanted into beds with a soil and perlite medium and moved into either a light deprivation greenhouse or outdoor cultivation building where they continue their 'vegetative' cycle.

2.2. CULTIVATION PLAN AND SCHEDULE

The outdoor cultivation will occur in greenhouses. The greenhouses consist of heavy gauge steel tubing, covered with a woven poly translucent opaque tarp. Each greenhouse is ventilated by intake and exhaust fans. The outdoor greenhouses will utilize light deprivation techniques without the use of artificial light to produce up to two (2) flowering cycles per year.

2.3. IRRIGATION PLAN AND SCHEDULE

Irrigation and fertigation of plants occurs using drip irrigation and some top-feed hand watering methods as appropriate. PUNTA CANNA, LLC maintains that 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.

2.4. HARVESTING AND DRYING

Drying will occur in the proposed 40' x 54' ag exempt drying building. Plants that are ready for harvest have their flowering branches removed and suspended in a proposed drying room which is equipped with ventilation fans. The drying process takes approximately one week.

2.5. PROCESSING FACILITY

All cannabis processing will occur on site at the proposed 20'x57' building. The facility will incorporate all aspects of processing including drying, curing, and trimming, and will include an ADA restroom for employees. The restroom will include a working flush toilet as well as a sink with cold and hot running water. The proposed metal building will have an engineered concrete slab and will conform to commercial building standards per the 2019 California Building Code.

2.6. EMPLOYEE PLAN

PUNTA CANNA, 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.

2.6.1. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY

- *Agent in Charge*: Responsible for business oversight and management of the PUNTA CANNA, LLC. 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*: Provides support to the *Lead Cultivator* in their day to day duties and takes the lead role during times when the *Lead Cultivator* may be off site. Once processing activities commence, the *Assistant Cultivator* duties switch to oversight and management of processing the dried medical cannabis. This is a full-time, seasonal position.
- *Laborer*: Provides cultivation, harvesting, and processing support including trimming. This is a part-time to full-time, seasonal position.

2.6.2. STAFFING REQUIREMENTS

In addition to the *Agent*, *Lead Cultivator*, up to eight (8) 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 ten (10) employees on site.

2.6.3. EMPLOYEE TRAINING AND SAFETY

On site cultivation, harvesting, drying, and trimming 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; and correct hand trimming methods. All cultivation and processing staff are provided with proper hand, eye, body and respiratory Personal Protective Equipment (PPE). Access to the onsite cultivation, drying and processing 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.

2.6.4. TOILET AND HANDWASHING FACILITIES

The proposed processing building will include one (1) ADA-compliant restroom, including a working flush toilet as well as a sink with hot and cold running water. 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 restroom facility.

2.6.5. ON SITE HOUSING

No on-site housing is proposed. All full-time and seasonal employees live off site and commute daily to the cultivation site.

2.7. SECURITY PLAN AND HOURS OF OPERATION

2.7.1. FACILITY SECURITY

An entry gate is located off Alderpoint Road. Access to the cultivation area is limited exclusively to employees. The cultivation and processing facility area will have low intensity exterior lighting to illuminate the entrances. All lighting will be designed and located so that direct rays are confined to the property.

2.7.2. HOURS OF OPERATION

Activities associated with cultivation in the greenhouses (watering, transplanting, and harvesting) generally occur during daylight hours. All other activities such as processing 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 is sourced from a surface water diversion from an unnamed stream (40.2235, -123.5996). The applicant has obtained a Small Irrigation Use Registration (H503567). The applicant will adhere to all measures in the SIUR and follow all forbearance periods.

Table 3.1 below outlines the current 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 rates.

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	20625	20625	20625	41250	41250	20625	20625	20625	20625	0	0
Estimated Total Annual Use 228,096											

3.2. WATER STORAGE

The applicant currently has 206,000 gallons of water storage in above ground plastic tanks. The applicant intends on adding additional storage if needed. Currently, the applicant has enough water to meet the forbearance period.

3.3. SITE DRAINAGE, RUNOFF, AND EROSION CONTROL

PUNTA CANNA, LLC has enrolled for coverage under the General Order (Order No. 2019-0001-DWQ) and a Site Management Plan has been developed utilizing Best Practicable Treatment and Control (BPTC) measures in accordance with Attachment A of the Order. The drainage and erosion control measures described below will be addressed in the SMP.

3.3.1. SITE DRAINAGE AND RUNOFF

The site is mostly flat with surface flow in the wet season generally draining from the northeast to the southwest. A large existing flat was resurfaced and shaped, which included the addition of a small flat above the legacy trailer park flat, and the realignment of an existing native material access road used to access the upper off-property residence. The fill slopes for these reshaped areas will be covered with "ROLLMAX" BioNET C125BN Erosion Control Blankets. These erosion control blankets are made of 100% coconut fiber with interwoven 100% biodegradable natural organic fiber netting utilizing a "leno-weave" pattern. This product meets type-4 specification requirements established by the Erosion Control technology Council (ECTC) and Federal Highway Administration's (FHWA) FP-03 Section 713.17. Bare soil areas will be seeded and mulched with hay to mitigate physical weathering of exposed soils due to precipitation and wind.

Cultivation facilities currently meet all required setbacks from watercourses, providing a sufficient buffer to prevent sediment and nutrient delivery. To further prevent runoff to riparian areas, water conservation and containment measures will be implemented including the use of hand irrigation to prevent excessive water use, and the maintenance of a stable, vegetated buffer between the cultivation area and riparian zone. The nearest surface waters are approximately 200-feet away.

3.3.2. EROSION CONTROL

PUNTA CANNA, LLC will utilize best management practices including but not limited to:

1. Maintenance of roads, including rocking where necessary to prevent erosion.
 - a. To break up hydrologic connectivity and mitigate road surface erosion, one (1) type-1 rolling dip will be installed along the access road used to access the water storage tanks, see Appendix A for the recommended location.
2. Proper management of solid, liquid and cultivation waste (see section 3.8)
3. Cultivation facilities and spoil stockpiles will meet all required setbacks from riparian and wetland areas.
4. Irrigation and application of fertilizers will be applied at agronomic rates.
5. Regulated products will be safely stored with secondary containment (see section 3.7)
6. Erosion Control Products will be used to prevent unchecked sheet flow from occurring over at 15-foot minimum intervals for slopes between 25% & 50%.

3.4. WATERSHED AND HABITAT PROTECTION

Adherence to the SMP ensures that the watershed and surrounding habitat are protected. The cultivation activities and associated structures are over 50 feet from the nearest surface waters, an ephemeral Class III drainage which lies east of the cultivation area. This setback distance in conjunction with a subgrade location provides a suitable buffer between the cultivation operation and potential habitat. Additionally, site development and maintenance activities utilize BPTC measures in accordance with the State Water Resources Control Board's recommendations. Any grading and earthwork activities will be conducted by a licensed contractor in accordance with approved grading permits and the SMP.

3.5. MONITORING AND REPORTING

Monitoring will be conducted to confirm the effectiveness of corrective measures listed in the SMP and determine if the site meets all of the BPTC Measures as per Attachment A of the Order. The Site Management Plan provides more details regarding Monitoring and Reporting. Punta Canna, LLC. staff track all water use and maintain accurate records of fertilizer applications. This information will be reported annually to the State Water Resources Control Board by March 1st of each year.

3.6. ENERGY AND GENERATOR USE

Power for the project will be PG&E and solar. On-grid electricity will be provided by PG&E for all cultivation uses. Currently, cultivation operations utilize a 4,000-watt solar array. The Solar array is used to control fans in the greenhouses and supply the residence with power.

3.7. USE AND STORAGE OF REGULATED PRODUCTS

3.7.1. 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 labeled containers in accordance with the manufacturer's instructions. 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 in attachment D for more details.

3.7.2. FERTILIZERS

Fresh soil is used every other cycle but is currently being amended and fertilized. Fertilizers used include:

Millennial Mix (1.7-1.9-0.6); A soil amendment.

Chicken Manure (3-2-2); a fertilizer..

Dr. Earth Bud and Bloom (3-9-4); a fertilizer. _____

All fertilizers and amendments are mixed into the growing medium at the beginning of the season. Un-used fertilizers are stored under cover and in secondary containment.

3.7.3. PESTICIDES AND FUNGICIDES

No pesticides or fungicides are used as part of cultivation activities.

3.7.4. FUELS AND OILS

Small amounts of gasoline are stored onsite to power the gasoline powered water pump used to move water from the point of diversion to the storage works. The gasoline and motor oil are stored under cover and in secondary containment.

3.8. WASTE MANAGEMENT PLAN

3.8.1. SOLID WASTE MANAGEMENT

Trash and recycling containers are contained in lidded cans, located within an enclosed area to prevent animal intrusion and contact with precipitation. Solid waste and recycling is hauled off-site to the nearest transfer station at least once per week.

3.8.2. CULTIVATION WASTE AND SOIL MANAGEMENT

Cultivation vegetative matter such as root balls, branches, and leaves are composted at a designated area. The soil containment area is lined to prevent any soil erosion or nutrient seepage. Used pots will be collected and stored in the barn for the winter. All packaging from soil amendments and fertilizers will be collected and disposed at an appropriate facility.

3.8.3. WASTEWATER MANAGEMENT

Hand watering methods minimize the over-irrigation of plants and subsequent runoff. Moreover, the greenhouse floors are gravel/dirt and will absorb any excess runoff.

A permitted septic system will be installed for the proposed processing building.

A portable toilet will be utilized and serviced as necessary until a septic system and the processing facility are developed.

4. PRODUCT MANAGEMENT

4.1. PRODUCT TESTING AND LABELING

As required by CA law, 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

Ivan Fiallo of Punta Canna, LLC is enrolled in the California Cannabis Track & Trace (CCTT) METRC program and complies with all METRC regulations.

4.3. TRANSPORTATION AND DISTRIBUTION

Transportation will be handled by a licensed transporter/distributor 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 distributor/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: References

- Bass, Ronald E., Kenneth M. Bogdan, and Terry Rivasplata. 2013. CEQA Desktop. Point Arena, CA; Solano Book Press. Page 44.
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- County of Humboldt. *Medical Marijuana Land Use Ordinance (MMLUO) – Phase IV, Commercial Cultivation, Processing, Manufacturing and Distribution of Cannabis for Medical Use* (Staff Report to the Board of Supervisors). January 26, 2016. <<https://humboldt.legistar.com/Calendar.aspx>> Date accessed: March 28, 2016.
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