

Date: 1/1/24

To: Humboldt County cannabis services

From: PJC Wellness

Re: update to operations plan

Operations Plan:

PJC Wellness operates a 10,000 sq ft mixed light cultivation site on APN#200-243-010 in the rural Fortuna area. The cultivation site is a designated, fully fenced area at a 600 ft set-back from the 1 neighboring residence and greater than 1000 ft from any recognized sensitive receptor sites. The cultivation area is located on prime agricultural soil. A full archeological review was performed on the site without significant findings or concerns.

PJC Wellness is managed by operating members / partners. PJC Wellness has no more than 2 FTE cultivation workers outside the LLC members / family.

Cultivation:

Cultivation will take place in commercial greenhouse structures.

The cultivation type is mixed light.

The supplemental lighting density is currently 10-12W per square foot. (Tier 2 CA state)

Lighting will be utilized to augment the duration of daylight cycles as necessary to maintain a vegetative growth state, as well as to potentially supplement light intensity on days of low natural light density.

All lighting elements will comply with the International dark sky standards.

The growing season is 12 months.

Growing style is "perpetual harvest", with harvests occurring every 3 weeks on rotation.

Cultivation cycle maximum for all raised beds is 5 cycles per year.

The estimated cycle length is 12 weeks.

Plants will be grown in soil in permanent raised beds.

There are 15 raised beds of approximately 600-625 sq ft each.

The total cultivation area is 9306 sf.

Estimated plant counts at any given time are 2500-5000 for the total cultivation area.

75% or greater of the soil will be amended and reused.

Plants will be fed with organic or synthetically derived nutrients applied through drip irrigation and top dressing.

Pest management will be managed via an integrated prophylactic pest management protocol.

Only products approved by the CA department of pesticide regulation will be utilized.

Fertilizers and pesticides are purchased on an as needed basis, without storage of substantial quantities of such product at any given time.

Small quantities of Fertilizers / pesticides are stored in a locked shed inside the secured cultivation area.

Ancillary nursery space:

PJC Wellness may produce some or all of its own nursery stock on site to supply its cultivation activities. Some immature plants will be sourced from CA licensed nursery facilities. The propagation of nursery starts takes place in existing on-site structures as well as 720 sq ft of outdoor cold frame space located in the upper northwest corner of the subject parcel. This space is designated for immature plants and housing of “mother” plants only.

Water supply / usage:

Water for irrigation is provided via a pre-existing on site well and rainwater catchment system. Household water is municipal supply.

Watering is managed through a metered, need based, drip irrigation system in the raised beds. Periodic supplemental hand watering is conducted as needed.

Watering is conducted in a manner such that water does not exit the cultivation structures.

The cultivation site is level with no salient erosion or water flow issues.

PJC Wellness maintains a tier 2 status with the north coast regional Water control board and is in compliance with all issues relating to discharge.

Total annual water usage is estimated to be approximately 180k gallons. This water usage may be higher than the industry average due the larger size and depth of our raised beds which are approximately 20 inches deep containing sustainable, organically active, living soil that has been in use since inception in 2018 without soil turnover or waste. A rainwater catchment system was installed in October 2021 and currently provides roughly 33% of our total annual water needs, with the potential to provide 50%. Water storage is currently 32k gallons with possible expansion to 62K gallons as conditions require. Rain catchment surface area is 6080 sq ft. Using rainfall data from <https://prism.oregonstate.edu/explorer/> the lowest rainfall year in the last 50 years was 2013 at 19.73 inches. Using a catchment surface area of 6080 square feet and the lowest rainfall of 19.73 inches, approximately 74,000 gallons of rainwater can be collected for irrigation.

Materials Management/ compliance testing:

All materials involved in the manufacturing and processing of products will be stored in the “Commercial ADA Trim/Processing” building (24’x24’) depicted on the Site Map and Premises Diagram. No volatile solvents or hazardous materials will be used in our manufacturing or processing activities. Typical household cleaners and sanitizing agents will be stored in a designated area of the processing building with appropriate signage. New packaging materials will be on labeled shelves in an enclosed/locked room with private access.

All manufactured and packaged products from this site will undergo Compliance testing from a licensed California laboratory to ensure potency and suitable levels of microbials, mycotoxins, pesticides, heavy metals, and foreign materials before distribution or delivery to a consumer. This compliance data will be made available to retailers and customers via a QR code or other identifying information on the product label.

Safety precautions involving the use of latex gloves, particulate masks, and aprons will be required for all employees handling and packaging cannabis products. Preliminary safety protocols will be demonstrated to all those involved in the process by means of orientation, intake forms or videos. Acknowledgement of safety procedures must be signed by occupants who enter the processing space.

Processing:

Small batch processing occurs nearly continuously. All processing and manufacturing activities are conducted within a 576 sf 1 story F1 commercial building with ADA bathroom and ADA parking area located on the parcel. A combination of machine and hand trimming by our immediate family and employees is used. PJC Wellness employs a maximum of 3 FTE employees for processing. All drying of product occurs in the 835 sq ft garage drying structure.

Manufacturing:

Manufacturing activities will involve the use of a pneumatic rosin press to extract cannabis oils from both “live” and “cured” flower. This extract will be used in the creation of infused pre rolls and other simple products. These products, as well as processed flower will be packaged and labeled on site within the “Commercial ADA Trim/Processing” building (24’x24’) depicted on the Site Map and Premises Diagram. Appropriate descriptions of products and Lab testing results will accompany other brand labeling that meet BCC guidelines for testing and labeling. One member of trained staff will operate the equipment and will be responsible for proper storage of finished products. The operation of this equipment and storage of final goods produced will occur in its own designated location within the processing room with appropriate signage demonstrating safety procedures. Final products will be transferred to the Storage area of the processing facility and organized by “Batch Numbers”, quantity, and “Type of Product”. Customers will be informed by the contents of said packaging through distinct labeling centered on the Primary Panel of the package in addition to the Informational Panel listing type, quality, COA, date, and other constituents of the product inside. Proper labeling and COA’s will abide by the Bureau of Cannabis Control (BCC) testing and labeling guidelines.

Distribution/ Transportation/ Farm based retail sales:

Processed bulk flower products are currently distributed via several Humboldt County licensed distribution companies. Product pick-up takes place at our farm location generally about 1x per month. We do not envision a substantial change in our current distribution practices. Products packaged for smaller individual unit sale will be sent through these licensed distribution companies and coincide with scheduled bulk flower pick-ups. No additional road use is anticipated. Having a distribution- transport only license allows us the option to bring our farm product to the distributor and to pick-up product being returned from the distributor without incurring additional expense or scheduling conflicts. We would like to participate in local cannabis events as they come available by way of farm based, off site, retail sales to customers at such events. We anticipate these retail activities will consist of 1 to 4 seasonal events.

A local, direct to consumer delivery service 1 or 2 days per week. These day / time slots will be accessible through our website where potential orders will be made at a minimum of 24 hours advance notice. Customers placing orders must be at least 21 years of age and will have to provide a valid form of California identification. All established state and local requirements relating to testing, consumer purchase, transportation and delivery of cannabis goods will be followed. No deliveries will occur outside of Humboldt County or a 50-mile radius of our facility.

Security:

PJC Wellness facility is located at the terminal end of a 1350 ft paved private road. The property has only 1 access point. The entire property is perimeter fenced with a security gate located at the entrance to the property. Access to the cultivation areas on the property necessitates passing directly in front of the residence. In addition, the entire cultivation area is located within the boundaries of an 8 ft commercial security fence with locked gates. The Property entrance, cultivation site, propagation areas, processing building, and home are all monitored by 24hour surveillance cameras with motion sensing. In addition, Coded lock pads are present on the drying, processing, and administrative hold areas as well as the security gate surrounding the cultivation area.