

Ramirez, Angelica

Public Comment

#4

From: Brandon Gesicki <cannariosllc@gmail.com>
Sent: Monday, December 13, 2021 11:51 AM
To: Williams, Das; Hart, Gregg; Hartmann, Joan; Nelson, Bob; Lavagnino, Steve
Cc: Vosburg, Alia; Dargel, Joseph; Ramirez, Angelica; sbcob; Richardson, Jennifer; Guillen, Christopher R.; Abel Maldonado
Subject: Canna Rios Applicant Response to Bien Nacido's Compost and Trucking Info: (Board of Supervisors, Dec. 14 Hearing: Agenda Item 4 Case No. 21APL-00000-00027 for LUP19-00000-00116)
Attachments: Canna Rios Cultivation Operations 12-12-21_.pdf

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Dear Chair Nelson & Honorable Supervisors,

Attached please find my response to Appellant's Composting and Trucking Memo, which explains Canna Rios' actual operations and provides more information about how we will be composting, harvesting, and the number of truck trips.

Please let me know if you have any questions.

Sincerely, Brandon Gesicki

831-206-6460 cell



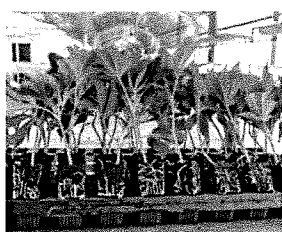
Canna Rios Cultivation Operations

From: Brandon Gesicki, Canna Rios Director of Compliance

Date: 12/13/2021

Introduction: I reviewed the Dec. 3, 2021 "Compost and Trucking Operations" memorandum prepared by Marianne Strange (Exhibit 4 to Dec. 7, 2021, Appeal letter). Her memo is based on several false assumptions about Canna Rios' cultivation practices (see end of my letter). By way of this letter, and as Canna Rios' applicant, who has been a legal-non-conforming cultivator on this Project site, I'd like to correct the record and provide more information about our actual cultivation practices to the County Board of Supervisors, which demonstrates that our actual compost methods and trucking operations do not match Ms. Strange's calculations. Please do not hesitate to let me know if you have any questions.

Nursery & Planting



We have two plantings per year: March/April and June/July. Unlike hemp, the cannabis plants we grow are smaller in size and grown for the colas (flowers), not plant mass. Immature plants are purchased and transferred through our on-site nursery. The compliance team is present during delivery and the counts on the manifest are verified. Immature plants are planted after a thorough square footage analysis is determined for spacing during planting. While we have permitted

46.29 acres of outdoor cannabis cultivation premises acreage, the actual canopy area (and # of state licenses) will be substantially less to account for roads, rows, and hoops. We will plant approximately 1,500 plants/acre and harvest a total of 69, 435 plants/harvest (2 harvests/year), if they all survive, which is unlikely, we average about 2% to 4% of plants fail to thrive.

Cultivation and Individual Tagging



After planting, individual Metrc tags are affixed to each plant at its stem. Plants are grown using organic growing practices.

Deleafing & Pruning Batching



About 2 to 4 weeks prior to expected harvest, maturation and readiness are determined by the cultivators. In a section of the grow that is determined ready, the farm crew removes most of the upper fan leaves (non-flowers). This is done to provide more sun to the colas (flowers). Green waste is measured and then transferred to the compost area to dry out or left to dry in the field and then tilled into the soil post-harvest (before the next harvest).

Harvest Day



After all of the plants have been pruned, or de-leafed, to their stems and colas, and the colas are ready for harvest, the farm crew will remove the plant's upper portion of colas (including stems), leaving the plant stalk and lower portion of the plant in place in the ground. That brown waste will later be removed and dried and chipped or tilled back into the soil. The first annual harvest will occur in July and the second annual harvest will occur in November.

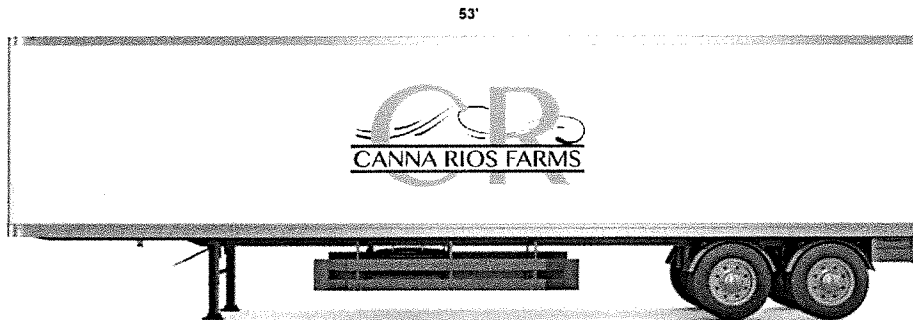


All plants are individually harvested (including the colas and stems removed from the plant) and are brought to the weigh station. The plant material collected from each plant at a time is brought and weighed together. The "wet weights" are compiled and reported in Metrc, creating a Harvest Batch for the amount removed from the plants in that day for each strain collected. Typically, 1-3 strains will be harvested together in one day. Plants left in the ground will be monitored for further growth of colas and at such time the process will repeat as necessary. The entire cultivation area will be harvested in about 21 days.

Wet Harvest Boxed for Processing



The fresh colas and stems are placed in large cardboard, breathable Agricultural (AG) boxes (3 ft wide, 4 feet deep x 3.5 feet high = 42 ft³) in bulk by license group and strain. Each agricultural box will be tagged by weight in that group containing about 50 wet plants for harvest processing after Manifested Travel. Canna Rios additionally provides in-house labeling and recording of numbers of boxes, date, strain, license number. Product is scheduled for truck pick up same day as harvest and the Metrc manifests and transaction orders are generated to document the sales and transfers.



53 ft semi-trailers have a capacity of 3,489 cu ft (cubic feet) and weigh 13,500 lbs.

Transport Wet Harvest Boxed Product to King City for Processing

Canna Rios Farms will transport up to 52 large AG cardboard boxes per truck (up to 53-foot semi-trailers) placed in 2 rows of 13 boxes on the bottom of the truck, with another stack of 2x13 boxes on top. The boxes are placed on wood crates to provide circulation. Mold will not develop during the approximately 2-hour truck trip (123 miles). Each AG box represents about 50 harvested plants per box, for a total of approximately 2,600 plants per trip, or about 1.7 acre of harvested area. Based on an estimate of 1,500 plants/acre (69,435 plants per harvest), the total truck trips per harvest season is approximately 27 truck trips to our King City, CA Processing Facility, but in no case will be more than 2 truck trips per day.

King City Processing

Plants will be dried, processed (extracted into oil or trimmed for flower), and packaged in King City.

False Assumptions Used in Marianne Strange's Memo:

1. Estimated Cost for Production of Legalized Cannabis, Calkins, Rand Drug Policy Research Center, July 2020:

Data used is from a 1992 study conducted by the University of Mississippi related to oven dried cannabis. The Report is also a "Working Paper" dated July 2010.

2. Mechanical Properties of Hemp (Cannabis Sativa) Biomass, Kronsbergs et.al., Proceedings of the 8th International Scientific and Practical Conference Volume 1, 2011

The single data point used here is for measuring hemp stock waste bulk to calculate cannabis bulk weight estimates. This is from a Latvia University of Agriculture paper discussing and promoting Herbaceous energy crops as Hemp farming for biofuel.

4. <https://www.pressdemocrat.com/article/news/annual-cannabis-harvest-underway-in-northern-california-as-pot-economy-trans/?artslide=5>

This October 2018 article from The Press Democrat seems to represent where the scientific data for the type of plant containers that they represent are standard industry that they claim we will use comes from and also where they assume our 600 truck transportation trips comes from. This is from a 700 plant one-acre biodynamic cannabis plot run by Terra Luna Farms in Glen Ellen, not a larger outdoor farm in Santa Barbara County.

5. ARB Emissions Inventory Methodology for Composting Facilities, 3/2/2015

This relates to emissions from Composting Facilities, not from green or brown waste generated by farmers and used at onsite farms.