

**NATURAL WELLNESS INC  
OPERATIONS MANUAL  
HUMBOLDT COUNTY, CA**

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**PROPOSED CANNABIS  
CULTIVATION FACILITIES**



PREPARED FOR:



JULY 2010

**Cultivation and Operations Manual  
For  
Natural Wellness Collective**

**Proposed Medical Cannabis Cultivation Facilities**

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**ATTACHMENTS**

- Appendix A: Personnel Acknowledgement Form
- Appendix B: Site Plan, Floor Plans and Elevations
- Appendix C: Pesticide Storage, Handling and Application Plan
- Appendix D: Emergency Procedures and Contact Information

## 1. PROJECT SUMMARY

### 1.1. PROJECT NARRATIVE

The Natural Wellness Inc (NWI) is applying for land use approval for existing cannabis cultivation facilities, located on Assessor Parcel Number (APN) 210-191-058, 40111 State Highway 36 near the community of Bridgeville. The proposed NWI cultivation facilities are within the County of Humboldt's (County) Forestry Recreation (FR) zone. The subject parcel is approximately 60 acres in size (Humboldt County GIS). Land uses surrounding the parcel are comprised of residential, timber and agriculture. The majority of the surrounding parcels are zoned Forestry Recreational (FR). The parcel to the south is zoned U (Unclassified).

The existing site consists of an existing two bedroom residence and barn. Existing cannabis cultivation totals approximately 19,426 square feet. This cultivation area is proposed to be relocated to environmentally superior areas. A less than 3-acre conversion for the proposed cultivation area is pending County approval.

Cultivation will occur in outdoor greenhouses totaling 19,420 square feet. The flowering greenhouses will not utilize any supplemental lighting. Supplemental lighting will be used in the nursery greenhouses from April 1<sup>st</sup> to August 15<sup>th</sup>. Sufficient water storage will be developed for the cultivation activity. All activity will meet the required setbacks.

Permits will be obtained from all jurisdictional government entities to ensure the operation is in compliance with all laws.

### 1.2. STATE AND LOCAL COMPLIANCE

#### 1.2.1. STATE OF CALIFORNIA COMMERCIAL CANNABIS ACTIVITY LICENSE

NWI will obtain a Commercial Cannabis Activity license from the State of California as soon as such license becomes available.

#### 1.2.2. STATE WATER RESOURCES CONTROL BOARD

An existing spring is the water source for domestic and irrigation use. An initial statement and small irrigation use registration have been filed with the State Water Resources Control Board (SWRCB). Application ID S024881 and H100250. NWI will develop additional water tanks to help offset diversion from the spring and is considering installing gutters on the existing barn and residence to offset surface water diversion.

#### 1.2.3. NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

NWI has been enrolled with the North Coast Regional Water Quality Control Board (NCRWQCB) Order No. 2015-0023. WDID Number 1B16908CHUM.

#### 1.2.4. HUMBOLDT COUNTY BUILDING DEPARTMENT

Building permits will be obtained from the Humboldt County Building Department for all existing structures, proposed structures and supporting infrastructure (including septic systems) and grading activity upon approval of the use permit.

#### 1.2.5. CAL FIRE

NWI has contracted with a Registered Professional Forester (RPF) to obtain a 3-acre conversion for the proposed cultivation facilities.

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**1.2.6. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE**

A Lake and Stream Bed Alteration Agreement (LSAA) will be obtained from the Department of Fish and Wildlife (DFW) for replacement of existing culverts and remediation of an existing stream channel that was previously impacted.

**1.3. AUTHORIZATION FOR COUNTY OF HUMBOLDT STAFF**

Per the County of Humboldt's *Commercial Medical Marijuana Land Use Ordinance No. 2544* (CMMLUO) §314-55.4, the *Natural Wellness Inc Operations Manual* contains the required information for operating medical marijuana cultivation facilities within the limits of the County of Humboldt. The operations detailed in the manual follow the operating standards described in CMMLUO §§314-55.4.10 and 314-55.4.11.

Natural Wellness Inc is committed to maintaining all necessary permits. Staff at the NWI is required to adhere to the *Natural Wellness Inc Cultivation and Operations Manual* to ensure compliance with state and local regulations (see Attachment A – *Personnel Acknowledgement Form*). Through this application, the applicant authorizes the County of Humboldt, its agents and employees, to seek verification of the information contained with this application, including verification of the operations as described in the *Natural Wellness Inc Cultivation and Operations Manual*.

Natural Wellness Inc consents for onsite inspection of the parcel by County officials at a prearranged date and time in consultation with the applicant prior to issuance of any permit and once annually thereafter. NWI acknowledges that the County reserves the right to reduce the size of the area allowed for cultivation in the event that environmental conditions, such as sustained drought or low flows in the watershed, will not support diversions for irrigation. NWI also acknowledges that the County reserves the right to engage with local Tribes before consenting to issuance of any permit, if the cultivation operations.

## 2. OPERATIONS PLAN

### 2.1. WATER SUPPLY AND WATER USE

NWI will utilize an existing spring and store water within water tanks for irrigation of commercial cannabis.

Two 30,000 gallon water bladders were installed in 2016 and 2017. These will be replaced with twelve 4,800 gallon tanks for a total 57,600 gallons of storage.

One 3,000 and one 1,500 gallon water tank were present in 2016 for a total of 4,500 gallons of storage

In 2017, two 4,800 gallon, one 1,000 gallon and one 2,500 gallon water tanks were installed for a total of 13,100 gallons of storage.

In 2018, eleven 4,800 gallons were installed for a total of 52,800 gallons of storage.

Total water storage in place as of July 2019 is 128,000 gallons

An additional sixteen 4,800 gallon water tanks are proposed to be installed which yields an additional 76,800 gallons.

Total water storage provided will total 206,600 gallons.

The applicant is evaluating the installation of gutters on the roof of on-site structures to off-set water diverted from the spring.

Refer to section 3.7.2 for a summary of irrigation practices.

A spring is used for a domestic water source for the residence and filling the water storage system during the winter diversion period.

### 2.2. SITE DRAINAGE, RUNOFF AND EROSION CONTROL

NWI will follow the recommendations of the Water Resources Protection Plan for site drainage, runoff and erosion control measures.

### 2.3. WATERSHED AND HABITAT PROTECTION

Any grading and earthwork activities will be conducted by a Licensed Timber Operator (LTO) or licensed contractor in accordance with approved grading permits and the WRPP. Maintenance and repair strategies for site development and road improvements will utilize best management practices, such as outslowing of roads, installation of water bars or other appropriate measures, to maintain slope integrity. Cultivation sites will be developed in accordance with NCRWQCB's best management practices for site development to ensure erosion control measures are effective to not allow discharges to streams.

Drainage, runoff and erosion control design and implementation will follow guidelines from several agencies and documents, including the following:

- Grading and Drainage Plan – Humboldt County Building Department (pending)
- Lake and Streambed Alteration Agreement (LSAA) – California Department of Fish and Wildlife
- Water Resource Protection Plan (WRPP) – North Coast Regional Water Quality Control Board (pending)



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All development activities within bed, bank or stream will be implemented according to the conditions associated with DFW's LSAA. Any modifications, improvements or maintenance will be implemented during the dry season. A forbearance period of one hundred and fifty (150) days will be observed if surface water diversion is required by the State of California for medical cannabis cultivation.

#### **2.4. USE AND STORAGE OF REGULATED PRODUCTS**

The State of California Agricultural Department as well as the Humboldt County Agricultural Department recognize the need for use of pesticides and fungicides. NWI will employ best management practices when storing, handling, mixing, application and disposal of all pesticides/fungicides. NWI will also engage in the use of pesticides and fungicides that have been approved by either the state of California Agricultural Department or the Humboldt County Agricultural Department or by any Humboldt County Ordinance or State of California Initiative.

NWI will follow required regulations in the storing, handling, mixing, application and disposal of any and all pesticides. The Agent In Charge will hold a State of California Agricultural Department Private Pesticide Applicators License issued through the Humboldt County Agricultural Department. Training of employees in the storing, handling, mixing, application, disposal and emergency spill containment and clean up procedure will be sole responsibility of the Lead Cultivator as the holder of the Private Pesticide Applicators License.

See Appendix D - *Pesticide Storage, Handling and Application Plan*).

Approximately 25 gallons of liquid fertilizer and 20 pounds of dry fertilizer will be stored on the site. Refer to the MSDS sheets in Appendix E for a summary of nutrients, pesticides and fungicides used.

All nutrients, pesticides and fungicides will be stored in the barn.

Five 5-gallon gas containers and ten 5-gallon propane containers will be stored on the site.

A copy of the Operations Plan will be kept on site by the Agent in Charge and will contain all material safety data sheets for all regulated products used on site (MSDS).

#### **2.5. WASTE MANAGEMENT PLAN**

##### **2.5.1. SOLID WASTE MANAGEMENT**

Covered waste and recycling bins will be located adjacent to the residence.

Waste will be removed from the property weekly and will be transported to Eel River Disposal.

Spent soil will be stockpiled in an excavated pit to prevent erosion and will be amended and re-used the following season.

##### **2.5.2. WASTEWATER MANAGEMENT**

On-site wastewater treatment will be implemented in the form of septic systems for the existing two-bedroom residence and a portable toilet for the cultivation site.

Restroom access will be available for all employees at the portable toilet.



## **2.6. EMPLOYMENT PLAN**

### **2.6.1. ALATORRE-ZENOVICH-DUNLAP-BERMAN AGRICULTURAL LABOR RELATIONS ACT STATEMENT**

Natural Wellness Inc 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), to the extent not prohibited by law.

### **2.6.2. CALIFORNIA AGRICULTURAL EMPLOYER COMPLIANCE**

NWI will comply with all applicable federal, state and local laws and regulations governing California Agricultural Employers.

### **2.6.3. JOB DESCRIPTIONS AND EMPLOYEE SUMMARY**

- *Agent in Charge*: Oversight and management of the entire facility. Responsibilities will include but not be limited to: personnel, records keeping, budget, and liaison with State and County inspectors as needed.
- *Lead Cultivator*: Oversight and management of the day to day cultivation of medical cannabis. This will include but not be limited to: irrigation, fertilization, pesticide management and harvest.
- *Assistant Cultivator / Harvest Manager*: The person will support the responsibilities of the Lead Cultivator. Mainly, the *Assistant Cultivator / Harvest Manager* will assist the *Lead Cultivator* in his/her day to day duties as well as take the Lead Role during times when the *Lead Cultivator* may be off site. During harvests, the *Assistant Cultivator / Harvest Manager* duties will switch to oversight of the harvest.
- *Seasonal Labor*: This position is temporary and employee count will vary based on the needs of the farm during the cultivation, harvest and planting seasons.

The *Agent in Charge* is a principal for the Natural Wellness. In addition to the *Agent in Charge*, *Lead Cultivator*, and *Assistant Cultivator/Harvest Manager* NWI intends to employ up to eight (7) Seasonal Labor positions for an estimated total of approximately ten (10) employees maximum at the Project site at any given time.

All NWI employees will be required to wear an NWI-issued photo ID badge on a lanyard at all times while working at the cultivation site. They will be required to read the NWI Operating Manual along with the NWI Employee Handbook. They will also be required to sign and date a form acknowledging they have read and understand its contents (see Attachment A – *Personnel Acknowledgement Form*).

The *Agent in Charge* will meet with the *Lead Cultivator* daily to discuss any pending internal issues relating to day to day operations as well as discuss any upcoming schedule needs. Each department will give a daily synopsis related to their particular tasks. This will include a daily plant count inventory, a daily fertilizer application summary, a daily pesticide application summary a daily water use summary and a daily inventory of processing and packaging as well as product packaged for distribution. The *Lead Cultivator* will maintain daily contact with the *Agent in Charge* to keep the *Agent in Charge* abreast of any issues that occur pertaining to cultivation, inventory, non-security related employee issues and facility compliance needs. It is the intention of the *Agent in Charge* to maintain a transparent communication at all times to ensure the uninterrupted flow of medical cannabis remains compliant and within the code of conduct.

#### **2.6.4. EMPLOYEE SAFETY PRACTICES**

All part time seasonal employees will be trained on proper safety procedure. This training will include but not be limited to: fire safety, proper harvesting techniques, use of harvesting equipment, use of rubber gloves and respirators, proper hand washing guidelines and an Emergency Procedures Plan in case of 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 in a conspicuous place. NWI will provide rubber gloves and respirators or dust masks to all employees. NWI will also provide each Employee with a written copy of emergency procedures and contact information (see Appendix D – Emergency Procedures and Contact Information).

### **2.7. CULTIVATION PLAN**

#### **2.7.1. PLANTING METHODS AND MEDIUMS**

Medical cannabis will be cultivated in raised beds within cold frame greenhouses (see Attachment C – *Site Plans, Floor Plans and Elevations*). The cold frames will consist of tubing, covered with a UV plastic tarp. Each cold frame will be ventilated by intake and exhaust fans as well as roll up side panels. These methods will run independently of each other.

A total of six (6) 20'x100', two 20'x80', one 20'x50' and one 20'x90', one 20'x71' full sun greenhouses and four (4) 20'x100' mixed light greenhouses are proposed.

Final Planting will be done in raised beds within the greenhouses. Each bed will be filled with an organic, nutrient-rich proprietary soil formula. A complete list of base soil and amendments will be recorded in the Lead Cultivators Handbook. All soil and amendments will be OMRI (or equivalent) certified and MSDS for each applicable amendment will be recorded in the Lead Cultivators Handbook. The total amount of plants per bed is dependent upon the cultivar and run length.

#### **2.7.2. IRRIGATION AND FERTILIZATION PRACTICES**

NWI will implement water resource management strategies designed in consultation with a local engineering firm to address water needs for the commercial medical cannabis activities described within this cultivation and operations manual. This plan may include but not be limited to:

- Annual forbearance as determined by a *Water Availability Analysis*
- Obtaining a Lake or Streambed Alteration Agreement for the water diversion works and storage through the Department of Fish and Wildlife (DFW)
- Enrollment in the North Coast Regional Water Quality Control Board's (NCRWQCB) Cannabis Cultivation Discharge Program (Order #R1-2015-00230, which includes preparation of a Water Resources Protection Plan (WRPP).

Water for medical cannabis irrigation will be obtained from storage tanks which are filled during the wet season from rainwater catchment system.

The *Lead Cultivator* will be solely responsible for the implementation of the irrigation and fertilization program. The *Lead Cultivator* will also provide the necessary training of the *Assistant Cultivator* and oversee all product handling.

A proprietary nutrient solution is prepared as needed by the *Lead Cultivator* and housed in a light-resistant, agricultural grade fertilization holding tank at each site. The solution is formulated by manufacturer instructions. The subsequent nutrient is then dosed with either an agricultural base or

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acid in order to ensure proper pH prior to feeding. MSDS and manufacturer labels will be available onsite.

During the vegetative phase, plants will be hand watered.

During the flowering phase, plants will be irrigated and fertilized with drip emitters specifically tailored to the application. Additional hand watering/feeding will be implemented at this stage at the direction of the *Lead Cultivator*, as needed.

**Estimated Annual Irrigation Water Usage (Gallons)**

Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec
0	0	4,650	12,100	20,100	32,400	44,650	40,200	32,400	14,050	0	0

The table above outlines the estimated irrigation water usage for NWI during a typical year. Irrigation water usage out will be dependent on weather conditions.

Irrigation water will be sourced from the point of diversion in March but will be sourced from water storage during the required forbearance period.

**2.7.3. WATER STORAGE**

Water storage is currently provided in the form of water tanks and water bladders:

(3) 30,000 gallon water bladders

(8) 4,600 gallon water tanks

For a total of 126,800 gallons of storage. An additional (16) 4,600 gallon water tanks will be obtained this winter for an additional 73,600 gallons of storage.

The total volume of water storage provided will be 200,400 gallons.

The water bladders will be replaced in the long term with hard storage. Twelve 4,800 gallon rain catchment water tanks are proposed.

**2.7.4. CULTIVATION SCHEDULE**

*March 15-April 1: Cycle 1 - Nursery Stock, Initial Transplant*

All plant samples used in NWI cultivation sites will be composed of clones taken from 'mother' plants. Mother plants are composed of samples that have been deemed to demonstrate superior genetics for desired outcomes. Cuttings, or *clones*, are taken from the mother plants starting March 15<sup>th</sup> and will be rooted in trays within a room in the barn. The *Lead Cultivator* will examine the clones and approve initial planting to begin.

Upon the *Lead Cultivator's* approval, the *Initial Transplant* will commence. The rooted clones will be planted directly into one (1) gallon plastic containers in nursery greenhouses #1 and #2. String lights hung along the ceiling of the nursery greenhouses will provide supplemental lighting to keep the plants in the vegetative growth phase.

*April 1-May 25th: Cycle 1 – Vegetative Phase and Secondary Transplant*

This point in the cultivation process most often referred to as the 'vegetative' cycle. Due to container and plant size, utilizing a hand watering method is most effective. When the *Lead Cultivator* has determined the plants have achieved desired height and plant growth density for secondary transplant, the plants are immediately planted into a raised bed within the flowering greenhouses.

*May 15<sup>th</sup>-August 1<sup>st</sup> – Cycle 2 Nursery Stock and Initial Transplant*

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Starting May 15<sup>th</sup>, cuttings from mother plants are taken and the second cycle of clones are rooted within the nursery. The *Lead Cultivator* will examine the clones and approve initial planting to begin.

Upon the *Lead Cultivator's* approval, the *Initial Transplant* will commence. The rooted clones will be planted directly into two (2) gallon plastic containers in nursery greenhouses #1-#2.

*May 25<sup>th</sup>-August 1<sup>st</sup>: Cycle 1 - Light Deprivation Phase,*

Taking into account factors such as height, growth density and overall health of the plant, the *Lead Cultivator* will determine the exact date for the Light Deprivation process to begin for the flowering green houses. Once that date is determined, 100% light resistant, specifically designed tarps will be automatically pulled over the inside of the cold frames. This process will reduce the day light hours from approximately fifteen (15) hours of daylight to the desired twelve (12) hours of daylight, twelve (12) hours of darkness desired to induce flowering. During the first two weeks of Light Deprivation, the plants will enter into a transitional phase. During this transitional phase plants will continue vegetative growth while transitioning into flowering.

*August 1-7th: First Harvest and Re-Planting*

Once the Light Deprivation Phase has concluded and the *Lead Cultivator* has determined the plants are at their peak, harvest procedures will be initiated (see *Harvesting Plan* for harvesting and processing procedure). The raised beds will be turned and amended. All amendments used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook.

Upon completion of the harvest, the clones within the nursery greenhouses will be transplanted into all flowering greenhouses

*August 7th - October 7th: Second Final Transplant /Natural Flowering Cycle and Harvest Two Phase*

Due to the natural decline in daylight hours, approximately one (1) month after the Re-Planting Phase has begun the plants will begin to flower naturally. This natural drop in light will negate the need for Light Deprivation Techniques. As in the Light Deprivation Phase, the plants will go through the transitional phase and final bloom phase. Once the plants enter into the bloom phase they will be fertilized using our proprietary high phosphorus feeding program. All fertilizers and supplements used are in accordance with Humboldt County and State of California Department of Agriculture compliance. MSDS are recorded into the Lead Cultivators Handbook. Once the plants are through the final bloom phase and the lead Cultivator has determined they have reached peak potential, Harvest Two will be initiated (see *Harvesting Plan* for harvesting procedure).

*October 7 - April 1: Repair, Upgrade and Recondition Phase*

NWI will inspect all cold frames and covers for wear and replace as necessary. The irrigation system will be inspected and repaired or replaced, as appropriate. Winter road and site maintenance will begin. The *Agent in Charge* and the *Lead Cultivator* will meet weekly to determine the best action plan for the upcoming season.

#### **2.7.5. GENERATOR USE PLAN**

The development site is served by Pacific Gas and Energy. Generators will be used for backup power only. Until an ag-service drop is developed, nursery greenhouses will be powered by a generator.

#### **2.7.6. LIGHTING PLAN**

There will be strings lights in the nursery greenhouses. The conservative window lights will be utilized is from April 15<sup>th</sup> to August 15<sup>th</sup> which accounts for seasonal variability in weather that affects when



cultivation activities may begin. HGI expects to start using lights two weeks later and stop using lights two weeks earlier than the dates above in a typical season.

The nursery hoops will be covered at 6 PM with black out plastic and lights will turn about 6:30 PM. The lights will turn off at 10 PM. The black out plastic will be removed at 10:30 PM. The tarps will ensure that the site meets International Dark Sky Standards.

No lights will be used in the flowering greenhouses.

#### **2.7.7. PRODUCT INVENTORY AND TRACKING**

Until such time as either a County or Statewide seed to sale tracking system can be implemented, NWI intends to follow an internally-developed tracking procedure. Inventory of all plants shall be performed by the *Agent in Charge* and *Lead Cultivator*. Batches of plants are inventoried by plant count within each greenhouse. This takes into account any plants that have been added to inventory from a permitted medical cannabis nursery and any plants that were removed from inventory (due to disease or pest infestation) or any plants moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented. After further investigation, any appropriate corrective measures will be taken.

##### *Tracking the Change of Plants to Bulk Inventory*

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This provides accurate yield information – a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future batches. This information is added to the records created in the previous phase. Specific details that are recorded include:

- Staff identification (at each step)
- Physical location of the plant material at all times

##### *Reporting*

Discrepancies are traced to the source, documented, and reported to the *Agent in Charge*. After investigation, any appropriate corrective measures are taken. All cultivation and harvest records are retained for a minimum of five (5) years.

#### **2.8. PROCESSING PLAN**

The Lead Cultivator will be responsible for all training of seasonal harvest employees. Workers employed as harvesters will be required to train in each aspect of the procedure including use of harvesting tools, proper harvesting techniques and fresh harvested plant handling, and curing of flowers. This training will also include the use of rubber gloves, face masks and hand washing requirements. Access to any part of the onsite Drying and Curing Facility will be limited to the Agent in Charge, the Lead Cultivator, the harvest Manager and authorized trained employees.

##### **2.8.1. HARVESTING PLAN**

Harvesting will be done by hand employing seasonal help. Each harvester will be issued an agricultural grade, spring loaded, hand held anvil style pruner. Each harvester will be trained by the Lead Cultivator on the use of the pruner and the methods by which each plant is to be harvested. In addition, NWI will provide all harvest workers with proper hand, eye, body and respiratory safety equipment.

At the time of harvest, each plant will be recorded into the master log. Each plant will be harvested individually. All waterleaf around the flowers are manually pruned. The plants are then cut into branches, approximately sixteen inches (16") long. The original numbered tag will remain with the cut plant. The branches are then transported to the barn building for drying.

Prior to entering the on-site drying and curing facilities, the product will be examined, weighed, recorded and logged into the Master Log by the Harvest Manager. Branches will be hung on racks in sheds to air dry and cure or on racks within the barn which will have dehumidifiers/heaters and circulation in the form of wall fans, exhaust fans and box fans. Each rack will contain the original numbered tag(s) of the plant(s). The exact date and time of day along with the identification numbers of each plant(s) will immediately be recorded into the Master Log.

The drying and curing process takes between five (5) and seven (7) days. The Harvest Manager and the Lead Cultivator will be checking the facility five (5) to six (6) times per day to monitor the progress.

Once the *Lead Cultivator* has determined the drying and curing process meets NWI proprietary standards, the dried and cured flowers are sent to processing facilities off-site. The *Lead Cultivator* will instruct the *Harvest Manager* to remove the racks from the drying and curing chamber. The *Harvest Manager* will be responsible for training employees hired as harvest labor. This training will include the *bucking down* procedure and the use of rubber gloves, particulate masks and hand washing.

*Bucking Down* is the process by which the actual flowers or buds are removed from the stalks. This is achieved by using scissors to cut each individual bud from the stalk into a sterilized, locking lid bin in bulk contractor bags. The discarded stalks will then be shredded and composted on site. Once each bin or bag is full the Harvest Manager will seal, label, weigh and record in the Master Log the contents of each bin. Each bin will then be moved into the storage room for transport to an off-site processing facility.

#### **2.8.2. DESCRIPTION OF PROCESSING LOCATION**

The Natural Wellness Inc will utilize an off-site licensed processing facility.

#### **2.8.3. NUMBER OF EMPLOYEES**

See Section 3.6.3.

#### **2.8.4. SUMMARY OF EMPLOYEE SAFETY PRACTICES**

See Section 3.6.4.

#### **2.8.5. TOLIET AND HANDWASHING FACILITIES**

NWI will install one portable toliet and will provide a handwash station. A record of cleanings will be kept in the restroom at all times and include date and time of day cleaned.

#### **2.8.6. PLUMBING AND SEPTIC SYSTEM**

See section 3.6.2.

#### **2.8.7. DRINKING WATER**

NWI will provide safe, clean, purified drinking water via store bought individual sealed bottled water bottles as well as an upright office style water cooler. Clean disposable paper cups will be made available to all employees.

#### **2.8.8. ROAD USE AND MITIGATION STRATEGY**

NWI started its initial road repair and maintenance activities. All roads are in the process of being out sloped. In addition, rolling dips have been inserted at regular intervals as required for standard maintenance for logging roads. All outlets for water are clear of debris and allow free flow of water from the road surface. All berms have been removed. In addition, all roads on the property are in the process of being rocked. Once initial road repair and maintenance activities are complete, seasonal maintenance will include regrading of out slopes and rolling water bars to ensure good run off. We will also replace rock where necessary.

NWI will conduct road maintenance inspections during any and all *major rain events*. NWI considers a *major rain event* to be any rainfall above one half inch (1/2"). This inspection will include observing existing features for any minor or major issues, such as rolling dips, standing water in outlets, and the diversion of water running directly down and eroding the road surface.

NWI will implement procedures to reduce traffic on our roads. Transportation and deliveries of cannabis and associated supplies will be delivered in bulk to minimize road impacts. NWI will encourage ride sharing to and from the site by seasonal employees. It is also our intention to provide transportation to and from the work the site via a company car. It will be the responsibility of the *Harvest Manager* to arrange the transportation of seasonal employees.

#### **2.8.9. ON-SITE HOUSING**

An existing single family residence will be occupied by a principal of NWI for housing and security purposes. No other residential structures are proposed as a part of this project.

#### **2.9. SECURITY PLAN**

Two locked gates are located at the entrance to the parcel. A *No Trespassing* sign is proposed near the gate. Security lights will illuminate the entrances and parking areas and cameras will be installed to monitor these key areas. Motion sensors, cameras and alarms will be installed at all cultivation sites, processing building and other sensitive areas. These security systems will be connected to mobile devices such as a cellphone.

The Agent in Charge or a caretaker will reside within the residence and be available 24 hours a day to address any security issues.

All potential employees will be subject to a criminal background check prior to employment. Employees will be issued a company issued ID badge and will be required to display the badge at all times while working at the subject property.

#### **2.10. TRANSPORTATION AND DISTRIBUTION PLAN**

Transportation will be handled via a third party, contracted, licensed transporter/distributor in accordance with MMRSA. All merchantable product will only 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. This distribution document is required for each movement of packages and will be recorded in the Master Log.

The *Agent in Charge* and the *Harvest Manager* are responsible for performing a physical inventory of all packages being transported, ensuring that the physical inventory reconciles with the transport



manifest, as well as the packaging material is intact and the labeling is secure. The distribution document records the current location and status of the packages, such as "in-transit" or "received." The licensed distributor must also create detailed transport manifests for the package distribution. The manifest contains details such as:

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

### **2.11. RESTORATION AND MONITORING**

See restoration plan in appendix F.

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**Appendix A: Personnel  
Acknowledgement Form**

### **Personnel Acknowledgement Form**

It is the intention of Natural Wellness Inc to create an enjoyable, safe and sane workplace. We feel that understanding and compliance with our Operations Manual will create just that. It is the responsibility of each employee to read and understand the procedures outlined herein. If after reading and reviewing this entire document, you have any questions please see the Agent in Charge immediately for clarification. By signing this document below, it confirms your reading, understanding and adherence to the entire *Natural Wellness Inc OPERATIONS MANUAL FOR MEDICAL CANNABIS CULTIVATION*.

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*Employee sign and date*

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*Agent in Charge sign and date*

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**Appendix B: Site Plan, Floor Plans  
and Elevations**

**Appendix C: Pesticide Storage,  
Handling and Application Plan**

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**Natural Wellness Inc**  
**Pesticide Storage, Handling and Application Plan**

All pesticides, disinfectants, fungicides and agricultural chemical products used by the Natural Wellness Inc(NWI), will maintain strict compliance with standards imposed by the Humboldt County Agricultural department and State of California Department of Agriculture Department and US Environmental Protection Agency. The manager will maintain a current Private Applicators License with the Humboldt County Agricultural Department. This license will be posted and a copy will be entered into the Manager's Handbook and available for view by any regulatory agency deemed appropriate by Humboldt County or State of California.

**Storage**

All pesticides, disinfectants, fungicides and agricultural chemicals will be secured in an appropriate locked and labeled housing and accessed only by those employees that have been trained under the guidelines of *State of California Agricultural Department Personal Pesticide Application License* guidelines in handling, application and disposal of each product. Entry into the locked facility will be logged by the Lead Cultivator. This log will include: The name of employee removing the material, the date and time of day and the amount and type of pesticide removed.

Any over-the-counter pesticide products may be applied by either the *Manager* or trained personnel in accordance with State of California Agricultural Department's Private Applicators License criteria. Training of employees will be in accordance with *State of California Private Applicators License* criteria. These products will be limited to safe chemicals recognized by the Humboldt County Department of Agriculture, the California Department of Agriculture and the Federal EPA. Copies of all MSDSs and labels will be clearly identified and maintained onsite at all times in the Lead Cultivators Handbook. NWI will make available to its employees saline eye wash stations where ever pesticides are stored.

**Handling**

The handling of pesticides/fungicide will be done in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines. Handling will include, transportation from retail outlet to cultivation site, logging and entering into secured, labeled storage, mixing, preparation, transport to application locations on site, application and disposal. These activities will be logged into the Master Log immediately by the *Lead Cultivator*. By having a strictly monitored Pesticide Management plan in place, NWI will strive for a "ZERO SPILL POLICY". In the event of a spill, NWI will maintain on site an Emergency Containment and Clean Up policy in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines.

NWI will also maintain on site in a clearly marked and accessible secure location any materials deemed necessary for clean up or spill containment and abatement. NWI will maintain a well-marked and easily accessible plan for accidental personnel exposure as well as proper applicators training as set forth by *State of California Agricultural Department Personal Pesticide Application License* guidelines

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in the event of such accidental exposure. Any spills or accidental personnel exposure will be reported to the appropriate agencies as deemed necessary by *State of California Agricultural Department Personal Pesticide Application License* guidelines. These incidents will also be documented into the Master Log by the Lead Cultivator.

**Application**

All application will be done in accordance with *State of California Agricultural Department Personal Pesticide Application License* guidelines. A copy of all applications will be manually entered into the Master Log. Proper eye, face and body protective wear as well as approved respirators shall be provided by NWI and worn and available at all times during application of all pesticides/fungicides. A preventive application program per manufactures directions and label requirements will be established from the onset of the plants initial transplant. Application frequency will vary with each phase of growth or infestation pressure. This will help to ensure the least amount of pesticide/fungicide will be needed. Application will end no less than thirty days before harvest or by manufactures able requirements, whichever is longer.

During application factors such as wind, temperature and humidity will be taken into account. This will ensure that the pesticide/fungicide is used in the most efficient manner and will mitigate drift. Pesticides will be applied using a variety of methods including atomizer, back pack sprayer and air less sprayer. Nozzle types and pressure settings will be determined by manufacture directions. Anywhere pesticide is applied NWI will provide a saline eye wash station in case of accidental exposure.

**Disposal**

Any mixed solutions will be used to their entirety. In the event there is a surplus of used mixed solution, it will be disposed of according to guidelines set forth by *State of California Agricultural Department Personal Pesticide Application License* procedures. After the applicator has finished application, the protective wear shall be discarded and disposed according to *State of California Agricultural Department Private Applicators License* guidelines. All bottles, containers or receptacles that have come into contact with, or contained, any product that falls under the state's guidelines for pesticides, disinfectants, fungicides and agricultural chemicals shall be washed, rinsed and or disposed of according to strict EPA and *State of California Agricultural Department Private Applicators License* guidelines. Proper training of employees in rinsing, washing and disposal shall be overseen by the Licensed Lead Cultivator on premise. All washing, rinsing or disposal of any product packaging, applicator or protective clothing will be logged into the Master Log.

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**Appendix D: Emergency  
Procedures and Contact  
Information**

## **Emergency Procedures Instructions Natural Wellness Inc**

*The first priority in the event of an emergency is for the safety of all people present. Move quickly out of area danger. Meet at assigned meeting place to get a headcount. Enact Emergency Procedures.*

### **Emergency Phone Numbers**

#### **Dial 911 for Fire/Police/Ambulance:**

- 1. Tell the operator which emergency service you want**
- 2. Wait until the service answers**
- 3. Give the following address:**

**Humboldt County APN 210-191-058  
40111 State Highway 36  
Bridgeville CA, 95526**

- 4. Do not hang up until told to do so by the 911 Operator**

### **Other Emergency Contacts**

**Humboldt County Sheriff: 707-445-7251**

**Bridgeville Cal Fire: 707-777-3636**

**Bridgeville VFD: 707-777-3424**

**Humboldt County HazMat: 707-445-6215**

**Humboldt County Ag Dept.: 707-441-5260**

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## **Fire and Emergency Procedures Checklist**

*You must know and understand what to do if a fire occurs. Your first concern is the immediate safety of visitors and staff; secondly, the need to call emergency services and then to contain the fire but only if it is safe to do so. If help is available, allocate responsibilities to others to create a competent fire fighting team.*

- Evacuate people from the area
  - If it is safe to do so, switch off power to all equipment
  - Call the fire department (dial 911)
  - If a small fire, use your fire extinguisher if it is safe to do so – try to contain and extinguish the fire
  - If the fire is near a fuel tank, do not attempt to extinguish the fire – retreat to a safe distance
  - Be prepared to direct the fire service to the scene
-

## **Spill Procedures Checklist**

*You must know and understand what to do if a spill occurs. Your first consideration is the immediate safety of visitors and staff; secondly, the need to call emergency services and then contain the spill if it is safe to do so. If help is available allocate responsibilities to others to create a competent team to deal with the spill.*

- If the spill is from the hose or tap, shut the isolation valve
  - Warn people in area of the spill – evacuate if necessary
  - Remove sources of ignition if flammable substance present
  - Evaluate the spill – only respond if you believe it is safe to do so
  - Refer to the safety data sheet or call on an approved handler or other specialists for advice
  - If necessary, call emergency services and advise local authority
  - Put on safety equipment (e.g. overalls, boots, gloves, eye protection, etc.)
  - Contain the spill if it is safe to do so – utilize a drip tray or oversize container or spill kit to soak up the substance
  - Dispose of waste safely as set out in the material safety data sheet
-

## **Incident Reporting**

*Every accident resulting in injury or damage to farm property must be reported to your manager immediately.*

**Respond to the accident promptly and positively**

**Collect relevant information about the accident**

**Develop and take remedial actions**

**Complete insurance claims and reports required**

### ***First Aid***

- A first aid kit must be kept on the premises and maintained
- All staff must know basic first aid procedures

### ***Minor Injury Accidents***

- Minor cuts and abrasions must be attended to immediately
- If in doubt contact a physician or call 911

### ***Serious Injury Accidents***

- Call an ambulance immediately (dial 911)
- Seek the assistance of any first responder
- Stabilize Victim
- Advise your manager

### ***Property Damage***

- All damage to farm property must be reported to your manager
-

## **Emergency First Aid-Procedures**

### **Control of Bleeding**

- 1. Direct pressure – use your hand(s).**
- 2. Elevate (raise) the limb**
- 3. Apply a pad and firm bandage.**
- 4. If necessary use clean rags or clothing.**

#### ***Remember!!***

- Always check circulation below the bandage!***
- If there is tingling, numbness or blueness loosen the bandage.***

### **Management of Burns**

- 1. Cool the burnt area with cool water for 10-15 minutes**
- 2. If necessary, cover the burn with a clean dressing or plastic wrap before removing person to medical aid.**

#### ***Remember!!***

- Do not burst blisters.***
  - Do not remove clothing that is stuck.***
  - Do not apply creams***
-



## **Management of Eye Injuries**

### **Foreign bodies in the eye(s)**

- 1. Wash the eye(s) with eyewash or clean water.**
- 2. If the foreign body is stuck to the eye DO NOT attempt remove.**
- 3. Place covering over the eye and obtain medical attention.**

### **Management of Chemicals in Eye(s)**

- 1. Wash the eye(s) with clean cool water for at least 15 minutes.**
- 2. Wash from near the nose outward.**
- 3. Always wash under the upper eyelid.**
- 4. Obtain medical attention**

### **Breathing**

**If a person is breathing but unconscious turn them on their side to prevent tongue swelling or vomit from obstructing airway.**

### **If person *is not breathing***

- *Check airway for blockage and clear***
  - *Call 911***
  - *Administer CPR***
-

### **Location of Firefighting Equipment, Spill and First Aid Kits**

**A fire extinguisher is located in the following places:**

- *All Cold Frames*
- *Nutrient and Fertilizer Storage*
- *Drying barn*

**A first aid kit is located in the following places:**

- *Cultivation Site*
- *Nutrient and Fertilizer Storage*
- *Drying barn*

**A spill kit is located in the following places:**

- *Cultivation Site*
  - *Nutrient and Fertilizer Storage*
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**Appendix F: RESTORATION AND  
MONITORING PLAN**