

**Summary of Water Consumption for both INDOOR and GREENHOUSE Cannabis Cultivation @  
13350 River Road,LLC  
Mission Lane @ River Road, San Luis Obispo County  
Permit No DRC2018-00036  
Exceptions to Applicants Environmental Submittals (SCH# 2019069095) Water Management  
Water Demand Analysis and Summary**

Sirs:

Based on the applicants stated total of 6.44 acre-feet/year of total water demand. 1.64 acre-feet/year of that total is included in odor control, making the **STATED PLANT WATER DEMAND; 4.8 acre-feet/year**. We do hereby take exception to the demand factors this applicant has provided for this project as follows:

- 1) Our annual indoor water demand calculations project a 7.3 acre-feet/year demand (see attached).
- 2) Our annual greenhouse water demand calculations project a 21.9 acre-feet/year demand (see attached).
- 3) The plant demand alone for these two cultivation areas would more realistically assess a combined total of 29.2 acre-feet of annual demand.
- 4) Next, we need to add back the odor control water demand of 1.64 acre-feet which would now total **30.84 acre-feet of ACTUAL annual demand**.
- 5) The applicant would have you believe the combined total of annual demand to be only 6.44 acre-feet. When assessing a more likely 30.84 acre-feet which means that the applicants calculations are 130% off from what the projects ACTUAL water usage is modestly projected to demand.
- 6) Finally, when we are left to consider the applicants **ANNUAL STATED PLANT WATER DEMAND** we are left with extremely low daily water levels that no experienced cannabis farmer would offer as an honest value, relative to the water requirements based on the canopy size offered in their own CEQA project submittals (see attached).

**STATED:**  $4.8 \text{ (acre-feet/year)} \times 325,851 \text{ (acre-foot:gal)} = 1,564,084 \text{ (annual gal)} \div 365 \text{ (days)} = 4,285 \text{ (gal/day)}$   
 $177,250 \text{ (combined sq-ft)} \div 16 \text{ sq-ft (per plant area)} = 11,078 \text{ (plants)}$   
 **$4,285 \text{ (gal/day)} \div 11,078 \text{ (plants)} = 0.38 \text{ gal/day/16 sq-ft area}$**

*Under this scenario it will take 2.6 days to accumulate 1 gal of water to feed a single 16 sq-ft area!*

We would ask that this project not be approved unless the water demand calculations we've shown here are to be considered in the project's approval. These demands are realistic in terms of the plants uptake requirements but do not include water demand levels for any other use such as wash down, processing, etc. If the project is to be approved, we ask that the water be metered and electronically monitored so that if at any point during the year the applicant exceeds the stated 6.44 acre-feet demand, there will be a "suggested environmental tax" of \$5.00/gal of water consumed. If at any point during the year the project exceeds a 10% overage in demand the applicant must agree to shut down their operations for the remainder of that year.

The bottom line is we want, we need honest assessments of what these commercial cannabis facilities are going to do to our environment and adjoining industries if the ACTUAL water demands exceed the STATED demands. We rely on our government to assure us that these projections are accurate. As is currently the case, there is no penalty for an applicant who would understate their water demands in these applications. With the information we've provided herein, the ball is now squarely in your court to make certain these environmental conditions are accounted for.

*Concerned Citizens*

**Calculating Annual Average Water Consumption for INDOOR Cannabis Cultivation @  
13350 River Road, LLC  
Mission Lane @ River Road  
Permit No DRC2018-00036  
Exceptions to Applicants Environmental Submittals (SCH# 2019069095) Water Management  
Water Demand Analysis**

Sirs:

Based on the applicants stated total of 6.44 acre-feet/year of total water demand (1.64 of that is included in odor control), we do hereby take exception to the demand factors this applicant has provided for this project as follows:

- 1) For the purposes of this exercise, we are factoring a cannabis plants modestly assessed 3 gal/day water requirement when grown indoors. This value allows for an average consumption over the life of the plant. We will factor the area per plant water demand at 16 sq-ft per plant. This will account for a single mature flowering plant area calculation as well as multiple plants in that same area while in a vegetative state.
- 2) When completing CEQA applications the applicant will present the total sq-ft being considered for cultivation. As well as where the water will be coming from and how many gallons/day that operation will require. This will ultimately be converted into an acre-foot/year demand on whatever water supply will be feeding that applicant.

**1 acre = 43,560 sq-ft**

**1 acre-foot = 325,851 gallons**

- 3) Here is our project water demand analysis for a 33,250 sq-ft (canopy totals):

33,250 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 2,078 plants

2,078 (plants) x 3 gal/day water = 6,234 gal/day water

6,234 (gal/day) ÷ 325,851 (gal) = 0.02 acre-feet/day

**0.02 X 365 days = 7.3 acre-feet/year**

**Calculating Annual Average Water Consumption for GREENHOUSE Cannabis Cultivation @  
13350 River Road, LLC  
Mission Lane @ River Road  
Permit No DRC2018-00036  
Exceptions to Applicants Environmental Submittals (SCH# 2019069095) Water Management  
Water Demand Analysis**

Sirs:

Based on the applicants stated total of 6.44 acre-feet/year of total water demand (1.64 of that is included in odor control), we do hereby take exception to the demand factors this applicant has provided for this project as follows:

- 1) For the purposes of this exercise, we are factoring a cannabis plants modestly assessed 2 gal/day water requirement when grown in a greenhouse. This value allows for an average consumption over the life of the plant. We will factor the area per plant water demand at 16 sq-ft per plant. This will account for a single mature flowering plant area calculation as well as multiple plants in that same area while in a vegetative state.
- 2) When completing CEQA applications the applicant will present the total sq-ft being considered for cultivation. As well as where the water will be coming from and how many gallons/day that operation will require. This will ultimately be converted into an acre-foot/year demand on whatever water supply will be feeding that applicant.

**1 acre = 43,560 sq-ft**

**1 acre-foot = 325,851 gallons**

- 3) Here is our project water demand analysis for a 144,000 sq-ft (canopy totals):

144,000 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 9,000 plants

9,000 (plants) x 2 gal/day water = 18,000 gal/day water

18,000 (gal/day) ÷ 325,851 (gal) = 0.06 acre-feet/day

**0.06 X 365 days = 21.9 acre-feet/year**

## Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # **2019069095**

**Project Title:** DRC2018-00036 13350 River Road LLC (previously Dayspring Pretty) Conditional Use Permit

Lead Agency: County of San Luis Obispo

Contact Person: Eric Hughes

Mailing Address: 976 Osos Street, Room 300

Phone: (805)781-1591

City: San Luis Obispo

Zip: 93408-2040

County: San Luis Obispo

**Project Location:** County: San Luis Obispo

City/Nearest Community: San Miguel

Cross Streets: Mission Lane xs. River Road

Zip Code: 93446

Lat. / Long.: 37.75083° ' " N/ 120.67942° ' " W Total Acres: 62.94

Assessor's Parcel No.: 027-271-041

Section: \_\_\_\_\_

Twp.: \_\_\_\_\_

Range: \_\_\_\_\_

Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: 101

Waterways: Salinas River

Airports: \_\_\_\_\_

Railways: Union Pacific

Schools: \_\_\_\_\_

San Miguel Joint Union Elementary School District.

### Document Type:

CEQA:

☐ NOP

☐ Early Cons

☐ Neg Dec

☒ Mit Neg Dec

☐ Draft EIR

☐ Supplement/Subsequent EIR

☐ (Prior SCH No.) \_\_\_\_\_

☐ Other \_\_\_\_\_

NEPA:

☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other:

☐ Joint Document

☐ Final Document

☐ Other \_\_\_\_\_

### Local Action Type:

☐ General Plan Update

☐ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☐ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☐ Site Plan

☐ Rezone

☐ Prezone

☒ Use Permit

☐ Land Division (Subdivision, etc.)

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☐ Other \_\_\_\_\_

### Development Type:

☐ Residential: Units \_\_\_\_\_

Acres \_\_\_\_\_

☐ Office: Sq.ft. \_\_\_\_\_

Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Commercial: Sq.ft. \_\_\_\_\_

Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Industrial: Sq.ft. \_\_\_\_\_

Acres \_\_\_\_\_

Employees \_\_\_\_\_

☐ Educational \_\_\_\_\_

☐ Recreational \_\_\_\_\_

☐ Water Facilities: Type \_\_\_\_\_

MGD \_\_\_\_\_

☐ Transportation: Type \_\_\_\_\_

☐ Mining: Mineral \_\_\_\_\_

☐ Power: Type \_\_\_\_\_

MW \_\_\_\_\_

☐ Waste Treatment: Type \_\_\_\_\_

MGD \_\_\_\_\_

☐ Hazardous Waste: Type \_\_\_\_\_

☒ Other: Cannabis Activities

### Project Issues Discussed in Document:

☒ Aesthetic/Visual

☐ Agricultural Land

☒ Air Quality

☐ Archeological/Historical

☒ Biological Resources

☐ Coastal Zone

☐ Drainage/Absorption

☐ Economic/Jobs

☐ Fiscal

☐ Flood Plain/Flooding

☐ Forest Land/Fire Hazard

☐ Geologic/Seismic

☐ Minerals

☒ Noise

☐ Population/Housing Balance

☐ Public Services/Facilities

☐ Recreation/Parks

☐ Schools/Universities

☐ Septic Systems

☐ Sewer Capacity

☐ Soil Erosion/Compaction/Grading

☐ Solid Waste

☒ Toxic/Hazardous

☐ Traffic/Circulation

☐ Vegetation

☒ Water Quality

☒ Water Supply/Groundwater

☐ Wetland/Riparian

☐ Wildlife

☐ Growth Inducing

☐ Land Use

☒ Cumulative Effects

☒ Other Energy and Greenhouse Gas Emissions

### Present Land Use/Zoning/General Plan Designation:

Agriculture

### Project Description: (please use a separate page if necessary)

See Attached. This is a revised Draft Mitigated Negative Declaration

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Emergency Services
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> CalFire	<input type="checkbox"/> Parks & Recreation
<input checked="" type="checkbox"/> Caltrans District # 5	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Planning (Headquarters)	<input checked="" type="checkbox"/> Regional WQCB # 3
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Coachella Valley Mountains Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Commission
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers and Mtns Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mountains Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # 4	<input type="checkbox"/> Tahoe Regional Planning Agency
<input checked="" type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> General Services, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> Health Services, Department of	
<input type="checkbox"/> Housing & Community Development	<input type="checkbox"/> Other _____
<input type="checkbox"/> Integrated Waste Management Board	<input type="checkbox"/> Other _____
<input type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date December 29, 2020 Ending Date January 31, 2021

### Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: <u>976 Osos St Rm 300</u>	Address: _____
City/State/Zip: <u>San Luis Obispo, CA 93401</u>	City/State/Zip: _____
Contact: <u>Eric Hughes</u>	Phone: _____
Phone: <u>805-781-1591</u>	

Signature of Lead Agency Representative: Eric Hughes Date: 12/28/2020

Digitally signed by Eric Hughes  
DN: cn=Eric Hughes, email=Eric.Hughes@cos.sbo.ca.us,  
c=California, ou=Building, ou=San Luis Obispo  
County, cn=Eric Hughes  
Reason: I am the author of this document  
Date: 2020.12.28 15:10:40-0800

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



**Project Description - 13350 River Road LLC (previously Dayspring Pretty) Conditional Use Permit (DRC2018-00036)**

Hearing to consider a request by 13350 River Road LLC (previously Dayspring Pretty) for a Conditional Use Permit (DRC2018-00036) to authorize cannabis operations with up to three acres of outdoor cultivation in hoop structures, up to 22,000 square feet of indoor mixed-light cultivation, up to 27,570 square feet of ancillary cannabis nursery, and operation of a non-storefront dispensary. The dispensary, as well as ancillary processing, curing, drying and trimming, and ancillary nursery will occupy a 4,740 square foot existing winery building. The project will include the construction of one greenhouse building with a total combined floor area of 45,000 square feet and the installation of 20, 5,000-gallon water storage tanks. In addition, a new 5,000 sq.ft. metal building will be constructed to be used for drying and processing and the placement; one searain container will be used for the storage of agricultural equipment. Outdoor cultivation and nursery activities will occur within a total of 63 hoop structures. The project includes a request for an ordinance modification to reduce the required number of parking spaces from 95 to 24. The project will result in approximately 13.4 acres of site disturbance on an approximately 63-acre parcel located at 13350 River Road, east of the community of San Miguel. The project is within the Agricultural land use category and the Salinas River Sub Planning Area of the North County Planning Area.

The greenhouses will be 14 feet and 4 inches in height. The 20, 5,000-gallon water storage tanks will reach a maximum height of 6 feet 4 inches. The proposed 5,000 sq.ft. processing building will be 35 feet tall and will incorporate design features that resemble a barn.

With the exception of the one ordinance modification discussed below, the project would meet all the requirements of the County Land Use Ordinance (LUO), including:

- Required 1,000-foot setbacks from sensitive receptors for all operations,
- Required 300-foot setbacks from the property line for outdoor cultivation, and
- Required 100-foot setbacks from offsite residences for indoor cultivation.

The regional location of the project site is shown in Figure 1, and an aerial view is provided in Figure 2. Table 1 provides a summary of project components.

**Table 1 – Project Components**

Project Component	Structure Size	Count	Area (sf)	Canopy (sf)	Canopy (acres)
Outdoor Cultivation					
Hoop Houses – Mature/Flowering	100' x 24'	56	159,000	127,680	2.93
Hoop Houses – Ancillary Nursery	100' x 24'	7	20,400	16,320	0.38
Total			179,400	144,000	3.30
Indoor Cultivation					
Greenhouse – Mature/Flowering	45,000 sq.ft.	1	24,000	22,000	0.50
Greenhouse – Ancillary Nursery			21,000	11,250	0.25
Total			45,000	33,250	0.76
Indoor Processing, Ancillary Nursery and Dispensary					
Indoor Processing	New 5,000 sq.ft. processing building		5,000	n/a	n/a
Total			5,000	0	0
Indoor Drying/Curing/Ancillary Nursery	First floor of existing 4,750 sq.ft. former winery building		640	Max. 640 sq.ft.	Max. 0.01
Indoor Processing			1,080	n/a	n/a
Indoor Dispensary Operation			440	n/a	n/a
Indoor Storage			145	n/a	n/a
Indoor Bathroom			65	n/a	n/a
Indoor Processing			Upper floor of existing 4,750 sq.ft. former winery building		2,370
Total			4,740	640	0.01
Total:			234,140 (5.3 acres)	177,890	4.08

#### *Operations*

The project will require a total of 5 full time staff consisting of 4 laborers who will live in the home onsite and a manager, who will arrive at approximately 6:00 am and leave in the afternoon before 2:00 pm. Three times a year, in June, August and late October for harvest, 4 additional employees will be employed onsite for a total of 9. These harvest times are six days long where the cannabis is cut and hung inside each hoop house or in the existing processing building. Once dried, the onsite staff cut and trim the product.

#### *Processing*

The project proposes to construct a new, 5,000 sq.ft. metal building for processing activities for cannabis products grown on site. In addition, a 4,090 sq.ft. portion of an existing former winery building will be used for processing that would include drying, trimming and curing; no manufacturing or the use of processing machinery is proposed. ). A 640 sq.ft. portion of the ground floor processing area will be used



cyclically for nursery then drying as the crops go through each grow cycle. The water use for this 640 sq. ft. of nursery space is included in the water estimate. This space will be equipped with an odor mitigation system.

Once cannabis products are processed, they would be transported off-site for testing, distribution, and sale. The building is served by eight paved parking spaces, including one space that is American Disability Act (ADA) compliant; the former winery building also includes a restroom and a secure storage area.

#### *Non-storefront Dispensary*

The project proposes to use a 440 sq.ft. portion of the existing winery building for a non-storefront dispensary. The dispensary would include a 145 sq.ft. secure storage area where cannabis products grown and processed on-site will be stored prior to delivery. The dispensary will receive orders over the phone and online and would make up to four delivery runs per day (8am, 11am, 2pm, and 6:30pm). Deliveries will occur via two drivers using two separate vehicles that will be kept onsite during non-delivery hours. Deliveries will be made to cities and counties within the State of California in which cannabis product deliveries are not prohibited. The applicant currently operates a dispensary in the City of Grover Beach with established employee safety protocols that will be applied to this operation.

#### *Security*

Access to the site would be directly from River Road by way of a paved driveway that will be gated and locked. While no road improvements are necessary, the applicant will be required to remove existing walls and gates from the County right-of-way (Public Works, September 2018) for which an encroachment permit will be required.

An existing six-foot high fence is located along the property lines fronting River Road and Mission Lane. The cannabis cultivation areas would be enclosed within a 6-foot tall secure chain-link fence with privacy slats along with an 11 foot tall polyethylene wind screen and vegetative screening for wind break and privacy (Figure 9). Locked gates and motion detection lights (downward facing to reduce light pollution) will be installed for secure access. Lighting associated with the greenhouses would be shielded with blackout screening to prevent views from offsite.

#### *Odor Management*

Odor associated with outdoor cultivation will be managed with the use of setbacks and barriers (hoop house materials and screened fencing) and by conducting processing activities within enclosed buildings. Each of the proposed outdoor cultivation areas will be located a minimum of 300 feet from all property lines. All structures utilized for indoor cannabis cultivation and processing will be equipped with sufficient ventilation controls (e.g. carbon scrubbers) and an odor neutralizing spray to eliminate nuisance odor emissions from being detected offsite. The proposed nursery operation is not anticipated to create any odor issues.

#### *Water Management*

Based on the Water Demand Analysis prepared for the project, project cultivation irrigation activities would result in approximately 6.44 acre-feet of water demand per year, including 1.64 acre-feet per year (AFY) for the proposed odor control systems. Domestic water use for 10 full-time employees has been estimated to result in about 0.1 acre-foot per year.

The project is located in the Paso Robles Groundwater Basin which is designated at Level of Severity III by the County's Resource Management System. However, the site is not located within an Area of Severe Decline. As such, the project will be required to offset the projected water use at a 1:1 ratio in compliance with the Countywide Water Conservation Program (CWWCP).



The project water demand would be served by an existing groundwater well. A total of 11 10,000-gallon water tanks would be installed on the property for seasonal storage of irrigation water.

#### *Waste Management*

All green waste consisting of dead and/or stripped-of-flower plants and soil will be composted onsite and reused. The compost area will be located in the northeast corner of the cultivation fenced area. Two commercial sized dumpsters will be located east of the existing residence for disposal of agricultural production materials and extraneous trash. This location is not visible from offsite due to intervening buildings and vegetation.

The existing on-site septic system would serve the project. Portable restrooms would also be located in the cultivation area. A permanent restroom facility is included within the existing former winery building which is served by an existing on-site septic system. Employees working within the proposed non-storefront dispensary would utilize the existing permanent restroom facilities.

#### *Pesticides and Fertilizers*

In accordance with LUO Section 22.40.050.C.3. all applications for cannabis cultivation must include a list of all pesticides, fertilizers and any other hazardous materials expected to be used, along with a storage and hazardous response plan. Products used onsite will be stored in two existing 320 sq. ft. seartrain containers within secondary containment in small containers within spill containment bins in the cultivation and nursery environments. Materials will consist of the following:

Pesticides			Fertilizers
Product	Type	Active Ingredient	
Azadirect	Liquid	Azadirachtin	Seaweed extract
Cueva	Liquid	Copper Octanoate	Mammoyh p
Dipel DF	Powder	Bacillus thuringiensis, subsp. kurstaki	Azos
DoubleNickel LC	Liquid	Bacillus amyloliquefaciens strain D747	Mykos
Kaligreen	Powder	Potassium bicarbonate	Potassium nitrate
M-Pede	Liquid	Potassium salts of fatty acids	Calcium nitrate
Mycotrol ESO	Liquid	Beauveria bassiana Strain GHA	Magnesium nitrate
Oximate 2.0	Liquid	Hydrogen dioxide/Peroxyacetic acid	Potassium thiosulfate
Oxigreen	Liquid	Peroxyacetic acid/Hydrogen peroxide	Ammonium phosphate
Pest Out	Liquid	Cottonseed, clove garlic oil	Mono potassium phosphate
Regalia	Liquid	Reynoutria sachalinensis	An20
Trilogy	Liquid	Clarified hydrophobic extract of neem oil	Ammonium sulphate
Xentari	Powder	Bacillus thuringiensis, subsp. aizawai	Magnesium sulphate
			Iron chelate 13%
			Magnesium chelate 13%
			Zinc chelate 14%
			Copper chelate 14%

**Ordinance Modification.** The project includes a modification from the parking provisions set forth in Section 22.18.050.C.1 of the County LUO. The type of commercial agricultural use that best matches the proposed cannabis cultivation is "Nursery Specialties" with a parking requirement of one parking space

per 500 square feet of floor area. The combined floor area of the proposed greenhouses and indoor operations is 47,370 square feet which, with the application of this parking standard, would require the applicant to provide 95 parking spaces. The project proposes a total of 24 parking spaces including one space designed to meet Americans With Disabilities standards. Up to ten employees may be on site at various times during the day. Therefore, 24 spaces are sufficient to meet the peak parking demand of the project.

**Baseline Conditions.** Existing development includes a single-family residence, agricultural accessory structures, a vineyard, and a 4,740 sq.ft. winery building that includes a second-floor vacation rental and a first-floor restroom. In order to comply with LUO Section 20.40.040.Q, Use of a Residence, the project will be conditioned to convert the existing vacation rental (2<sup>nd</sup> floor of winery building) to a non-residential use.

An existing paved parking area with eight spaces is located next to the winery building and would be used to serve cannabis activities.

The residential, agricultural and winery activities of the project site have historically been served by one existing well. Vineyards have not been cultivated since at least 2013, based on historic aerial photographs. A four-hour pump test performed in February 2018 indicates the existing well provides ample water to serve the proposed cannabis uses.

There has been no cannabis cultivation previously on the project site.