Summary of Water Consumption for GREENHOUSE & OUTDOOR Cannabis Cultivation @
RYAN LOVEJOY
11111 BITTERWATER RD., SANTA MARGARITA
Permit No DRC2018-00193
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 3.7 acre-feet/year** of combined greenhouse and outdoor water use (see attached pg 74), we hereby take exception to the values this applicant has provided for this project as follows:

1) Our annual greenhouse water demand calculations project a 3.28 acre-feet/year demand (see attached).

2) Our annual outdoor water demand calculations project a 2.4 acre-feet/year demand (see attached)

3) The plant demand alone for these cultivation areas would more realistically assess a combined total of 5.68 acre-feet of ACTUAL annual demand or a 42% difference between the STATED and ACTUAL values.

We propose, based on the information contained herein, that if this project is allowed to operate, the applicant/licensee be required to install, within 60 days of their being noticed, new ultrasonic flow meters at all incoming and outgoing water systems that would account for all real time (TOU/BIM compatible) water distribution and discharge on this project. Furthermore, once the TOU/BIM metering has been installed, we ask that the flow levels be electronically monitored so that if at any point during a 12 month period the applicant/licensee exceeds the STATED acre-feet demand, there will be a operational penalty assessed as a result of the project submission under assessment.

We propose that if the STATED ANNUAL WATER DEMANDS are exceeded at any point during that 12 month period, then it would be agreed, in advance, that the applicant would pay a suggested Tier 1 rate of $5/gal Environmental Water Tax (T1-EWT) on that overage up and until they exceeded it by more than 10% of the STATED VALUE. Once they exceed a 10% overage, they would be required to submit an AMENDED CEQA application where the applicants STATED ANNUAL WATER DEMANDS would match the REALITY of their operations. That AMENDED CEQA application would be given up to 120 days to be approved or denied. The applicant would be allowed to remain in operation for that 120 days but would be doing so under T2-EWT rates of $10/gal for that metered water consumed. If the project is denied they will have 10 days to cease operations or be subject to fines which could include forfeiture of their property as it represents an environmental risk.

The bottom line is we all want, **we ALL 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 have provided herein, the ball is now squarely in your court to make certain these environmental conditions are accounted for in your decisions.

Concerned Citizens

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Based on the applicants **STATED DEMAND TOTAL OF 3.7 acre-feet/year** of combined greenhouse and outdoor water use (see attached pg 74), we hereby take exception to the values 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 STATED 25,920 sq-ft (greenhouse canopy totals):

   25,920 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 1,620 plants

   1,620 (plants) x 2 gal/day water = 3,240 gal/day water

   3,240 (gal/day) ÷ 325,851 (gal) = 0.009 acre-feet/day

   ACTUAL GREENHOUSE DEMAND: 0.009 X 365 days = 3.28 acre-feet/year

   We propose this project, if allowed to operate, be required to install ultrasonic flow meters at all incoming and outgoing water systems that would account for all real time (BIM compatible) water distribution and discharge on this project.

Concerned Citizens

Summary of Water Consumption for OUTDOOR Cannabis Cultivation @
RYAN LOVEJOY
11111 BITTERWATER RD., SANTA MARGARITA
Permit No DRC2018-00193
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 3.7 acre-feet/year** of combined greenhouse and outdoor water use (see attached pg 74), we hereby take exception to the values this applicant has provided for this project as follows:

1) For the purposes of this exercise, we are factoring a cannabis plants modestly assessed 4 gal/day water requirement when grown outdoors. This value allows for an average consumption over the life of the plant. We will factor the area per plant water demand at 100 sq-ft per plant. This will account for a single mature flowering plant area calculation during a single 160 day grow cycle per year.

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 STATED 129,400 sq-ft (outdoor canopy totals):

   129,400 sq-ft (Total Area) ÷ 100 sq-ft (per plant area) = 1,294 plants

   1,294 (plants) x 4 gal/day water = 5,176 gal/day water

   5,176 (gal/day) ÷ 325,851 (gal) = 0.015 acre-feet/day

ACTUAL OUTDOOR DEMAND: 0.015 X 160 days = 2.4 acre-feet/year

We propose this project, if allowed to operate, be required to install ultrasonic flow meters at all incoming and outgoing water systems that would account for all real time (BIM compatible) water distribution and discharge on this project.

Concerned Citizens

COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING & BUILDING

Initial Study – Environmental Checklist

PLN-2039
04/2019

Project Title & No. Lovejoy Minor Use Permit ED19-308 (DRC2018-00193; previously DRC2018-00225)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

☒ Aesthetics	☒ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology & Water Quality	☐ Transportation
☒ Biological Resources	☐ Land Use & Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities & Service Systems
☒ Energy	☒ Noise	☐ Wildfire
☐ Geology & Soils	☐ Population & Housing	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Young Choi	Young Choi Digitally signed by Young Choi DN: C=US, E=ychoi@co.slo.ca.us, O=County of San Luis Obispo, OU=Department of Planning and Building, CN=Young Choi Date: 2020.03.27 08:52:42-07'00'	Planner	
Prepared by (Print)	Signature		Date
Steven McMasters	Steven McMasters Digitally signed by Steven McMasters DN: C=US, E=smcmasters@co.slo.ca.us, O=County of San Luis Obispo, OU=Planning & Building, CN=Steven McMasters Reason: I have reviewed this document Date: 2020.03.27 10:14:58-07'00'	Principal Environmental Specialist	3/26/20
Reviewed by (Print)	Signature		Date

Initial Study – Environmental Checklist

Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Planning Department, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. Project

DESCRIPTION: Request by **Ryan Lovejoy** for a Minor Use Permit (DRC2018-00225) to allow for the phased development of 22,000 square feet of indoor cannabis cultivation, three-acres of outdoor cannabis cultivation, 4,000 square feet of ancillary nursery, 3,000 square feet of drying in 9 permitted seatrain containers, and 320 square feet of storage in one seatrain container. The project includes the phased construction of six (6) 4,320-square-feet greenhouses totaling 25,920-square-feet of floor area (to house the 22,000-square-feet of indoor cannabis cultivation and 3,920-square-feet of ancillary nursery). The project would also include extension of a water line from an existing well to serve proposed cannabis activities, construction of 20-foot wide access road, and 26 parking spaces. An existing single-family residence, agricultural accessory structure, and approximately 30 acres of barley cultivation will remain. The project will result in the disturbance of approximately 6-acres on an approximately 42.2-acre parcel located at 11111 Bitterwater Road, on the northeast section of the intersection of with Hwy. 58, approximately 5 miles west of the village of California Valley. The project is within the Agriculture land use category and within the Carrizo planning area.

The project would employ up to four full-time employees; indoor cultivation would operate seven days per week, 24 hours per day, and outdoor cultivation would operate dawn to dusk. There will be part-time seasonal harvest labor onsite once a year. Project components and project phasing are summarized in Table 1 and Figure 4.

Initial Study – Environmental Checklist

Table 1 – Project Summary

Project Phase	Project Component	Proposed Cannabis Activity	Quantity/Total Square Feet
1	Outdoor Cultivation	Cannabis Cultivation (outdoor)	129,400 sq.ft. (2.97-acres)
2	New Greenhouses (6 buildings totaling 26,000 sf)	Cannabis Cultivation (indoor)	22,000 sq. ft.
		Ancillary Nursery	3,920 sq. ft.
1	Seatrain Containers (1)	Storage	320 sq. ft.
1	Seatrain Containers (9)	Drying	2,880 sq. ft.
1	Compost Area		1,200 sq. ft.
Total Area, All Uses			**159,720 sq. ft. (3.66-acres)**
Site Improvements (Road, parking & utility)			1.2 acres
Total Site Disturbance (includes construction disturbance)			**+/- 6 acres**
Area of Permanent Improvements (roads, parking and structures)			**+/- 2 acres**
Tree Removal			None
Signage			None
Parking			26
Employees			4 full time (up to 12 seasonal employees)

Summary of Proposed Cannabis Canopy

Outdoor Cultivation	129,400 square-feet (2.97-acres)
Indoor Cultivation	22,000 square-feet
Ancillary Nursery	3,920 square-feet

(b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

A 4-hour pump test completed in February 22, 2018 determined a measured flow rate of 15 gallons per minute. The project application materials provide the following estimate of existing and projected water demand prepared by the applicant:

The daily average water usage anticipated for the year is 3,194 gallons per day, or 3.7-acre feet per year (AFY). Water use is required to be metered and these data will be provided to the County every three months (quarterly). Should the metered water demand exceed the permitted quantity (3.7 AFY), the permittee will be required to undertake corrective measures to bring water demand back to within the permitted amount. In addition, the project will be conditioned to apply Best Management Practices for water conservation to maintain water use at or below the water analysis projections as described in the applicant's Water Management Plan. Such BMPs include, but are not limited to, the following:

- The use of drip irrigation systems and mulch to conserve water and soil moisture;
- Ongoing monitoring and maintenance of the water supply system;
- Installation of float valves on tanks to prevent tanks from overflowing;
- Installation of rainwater catchment systems to reduce demand on groundwater.

The conditions of approval will also require the project to participate in the County's ongoing cannabis monitoring program to ensure compliance with all conditions of approval and other relevant regulations. Therefore, impacts would be less than significant.

(c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

(c-i) *Result in substantial erosion or siltation on- or off-site?*

The project site is relatively flat, and is not located adjacent to hillsides, mudflow risks are insignificant. The project has been conditioned to provide final grading, drainage, erosion and sedimentation control plans for review and approval prior to building permit issuance as required by LUO Section 22.52.100, 110 and 120. Therefore, impacts would be less than significant.

(c-ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The project site is not located within a 100-year flood plain and the amount of increased impervious surfaces is not expected to exceed the capacity of stormwater conveyances or increase downslope flooding. Therefore, impacts would be less than significant.

(c-iii) *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The amount of increased impervious surfaces is not expected to exceed the capacity of stormwater conveyances or increase downslope flooding. Therefore, impacts would be less than significant.