Summary of Water Consumption for GREENHOUSE Cannabis Cultivation @
RP AGROCHIMEX
248 CARRISA HWY., SANTA MARGARITA
Permit No DRC2018-00168
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF *2.32 acre-feet/year** (see attachment pg 3) of water use, we 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 STATED 136,440 sq-ft (greenhouse canopy totals):

   136,440 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 8,527 plants

   8,527 (plants) x 2 gal/day water = 17,054 gal/day water

   17,054 (gal/day) ÷ 325,851 (gal) = 0.052 acre-feet/day

ACTUAL GREENHOUSE DEMAND: 0.052 X 365 days = 18.98 acre-feet/year
This project represents a potential 156% difference between STATED and ACTUAL water use.

*What we find especially troubling in this submittal package is the attached documents show the date where water would be used out of the year is limited to just 150 days as if this were and outdoor grow. But the applicant contradicts that in their own documents where they show the proposed cultivation will be done in greenhouses which enables year-round crop production. This project should not have been accepted when this type of information incompatibility is found.

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

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 # _____

Project Title: DRC2018-00168 RP Agrochimex, Inc. Minor 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

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Project Location: County: San Luis Obispo — City/Nearest Community: community of Santa Margarita

Cross Streets: Carrisa Highway and La Panza Road — Zip Code: 93432

Lat. / Long.: 35° 28′ 01.16″ N/ 120° 22′ 07.75″ W — Total Acres: 130

Assessor's Parcel No.: 0037-391-030 — Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: SR 58 — Waterways: Indian Creek, Shell Creek,

Airports: _____ — Railways: _____ — Schools: _____

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

Present Land Use/Zoning/General Plan Designation:

Agriculture

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

See Attached

Note: The state Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

January 2008

Reviewing Agencies Checklist

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

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

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

Starting Date 11/18/2020 Ending Date 12/18/2020

Lead Agency (Complete if applicable):

Consulting Firm: SWCA Environmental Consultants
Address: 1422 Monterey Street, B200
City/State/Zip: San Luis Obispo, CA 93405
Contact: Brandi Cummings
Phone: 805-543-7095 x6818

Applicant: _____
Address: _____
City/State/Zip: _____
Phone: _____

Signature of Lead Agency Representative: _____ **Date:** _____

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

Attachment 1 – Notice of Completion

Project Description

A request by **RP Agrochimex Inc**. ("RPA") for a Minor Use Permit (MUP, DRC2018-00168) to allow for the development of outdoor cannabis cultivation and ancillary structures on a 130-acre parcel. The project proposes a 3-acre cannabis cultivation facility and support infrastructure, including the development of 2.6 acres of hoop house structures for outdoor cannabis cultivation, two 2,880 square foot hoop houses to be used as an outdoor ancillary nursery, and ancillary structures that include a 900 square foot office building and two cargo containers for equipment storage. There is an existing metal agricultural barn that would be converted and used for ancillary processing and transport of the product off-site. The project proposes installation of outdoor lighting for security along fencing that would surround the development. A new 45,000-gallon water tank would be installed south east of the proposed office building for combined domestic and fire protection. Existing on-site agricultural roads would be upgraded to comply with the County of San Luis Obispo (County) and California Department of Forestry and Fire Protection (CAL FIRE) standards. The project includes establishment of parking areas within two flat areas adjacent to the existing agricultural barn and proposed office building. The project also includes installation of an on-site solar system. The project applicant is requesting a setback modification per County Land Use Ordinance (LUO) Section 22.40.050D.3.e. The proposed project would result in approximately 5.4 acres of ground disturbance. Ground disturbance activities include installation of new fencing around the cultivation and nursery areas, installation of planting beds and hoop houses in the cultivation and nursery areas, installation of the on-site solar system, and grading to support the driveway improvements and construction of building pads for the office building. The project would involve grading approximately 2.3 acres to support improvements to the existing driveway and construction of new building pads for the office building. Construction would result in approximately 2,102 cubic yards of cut and 1,653 cubic yards of fill, resulting in a total grading volume of approximately 3,755 cubic yards.

The project proposes to use an on-site well for operational water use. The project would use between 0.04 to 0.46-acre-feet of water per month based on cultivation need, which is approximately 2.32 acre feet/year (AFY) of water per year. Development of solar panels is proposed to generate most of the project's electricity needs. The project would use approximately 2,290,295 kWh of energy for outdoor cultivation and ancillary uses. Nuisance odors from the project would be controlled using industry best practices that includes administrative controls and engineering controls (design, operation, and maintenance) that would occur upon permit issuance and availability of control technology.

Project operations include outdoor cultivation of cannabis in a 2.6-acre canopy structure located on the northern portion of the site on vacant, tilled land. Land for operations would be prepared by disking three times, chiseling (ripping) 3-feet four times, and then disking again three times. Six tons of well-composted organic green-waste manure would be applied and incorporated into the soil coincident with the disking operations. Cannabis would be planted into planting beds by hand in early June for optimal yield. The project proposes the planting of 2,178 plants per acre. Harvesting would take place three times per year in May, July, and October within a 24-hour period. Ancillary cannabis activities that would take place on-site include trimming, drying, packaging, and loading product for transport. Cannabis product would be stored on-site in vacuum-sealed containers in the existing barn or immediately transported to a facility for oil extraction. Project operations would utilize five full-time employees with an additional five seasonal employees during cultivation periods. Project operations would occur between the hours of 6:30 a.m. to 6:30 p.m. Monday through Friday.

Baseline Conditions. The project is located on the northern portion of a 130-acre parcel, approximately 915 feet north of State Route (SR-) 58 and approximately 17.5 miles east of the community of Santa Margarita, within the North County planning area Shandon-Carrizo sub area. The site is characterized by irregular topography with a variety of soils including Oceano loamy sand, Arnold loamy sand, and Gaviota-San Andreas association soils. A biological resource assessment (BRA) conducted for the project identifies 43 special-status plant species and 23 special-status wildlife species in the project region. Of those identified, two special-status plant species and 11 special-status wildlife species, including migratory nesting birds, have the potential to occur on the project site.

Existing development on the property includes a 2,400 square foot metal barn with an existing septic tank located on a 0.4-acre graded pad in the northwest portion of the property. The property supports graded access roads that traverse the project site from west to east and north to south. An existing water storage basin is located to the south of the project site. The property is currently designated as Agricultural land, and previous uses of the property included equipment storage and private recreational use. The site has previously been subject to substantial ground disturbance. Surrounding land use includes undeveloped areas with scattered rural residencies to the east and north.

ANGLE
LAND USE ENTITLEMENT

RP AGROCHIMEX, INC.

248 CARRISA HWY SANTA MARGARITA, CA

MINOR USE PERMIT- CANNABIS CULTIVATION
PROJECT DESCRIPTION
(UPDATED FEBRUARY 2020)

PROPOSAL

- Minor Use Permit:
  - Outdoor Cultivation (2.6 acre canopy) within hoop houses
  - Conversion of existing metal barn (2,400sf) for ancillary processing (drying and trimming of onsite product only), packaging, loading/transport, secure room and employee break room
  - New +/- 5,760sf ancillary nursery (2-30x96' hoop houses)
  - Ancillary transport of onsite product
  - New Office Building (900sf)
  - Two Cargo Containers (320sf each (total 640sf)) for fertilizer/pesticide and equipment storage
  - Three, new 5,000 steel water tanks
  - Grading-improvements to existing access and new building pads

- Landowner: 248 Carrisa, LLC
- Applicant: RP Agrochimex, Inc.
- Agent: ANGLE Land Use Entitlement

The following application is for a Minor Use Permit to establish an outdoor cannabis cultivation operation with associated ancillary and accessory structures/improvements. The outdoor cultivation involves 2.6 acres inground within hoop house structures and another two hoop houses for a +/- 5,760sf nursery (2- 30x96'). There is an existing metal ag exempt barn (2,400sf) that is proposed to be converted and utilized for ancillary processing and transport of the product onsite. Supportive structures include a 900sf office building and two cargo containers for pesticide/fertilizer and equipment storage. The site has existing access from Carrisa Hwy and onsite agricultural roads that will be utilized and improved to County of SLO and Cal Fire standards. Grading improvements are necessary to improve access and create building pads for the new office and associated infrastructure. Approximately 2.32 acres of site disturbance will be required to satisfy these improvements.

SITE

- Address: 248 Carrisa Hwy Santa Margarita, CA 93453
- APN: 037-391-030
- Acreage: +/-130 acres
- Land Use Designation: Agriculture

EXISTING CONDITIONS

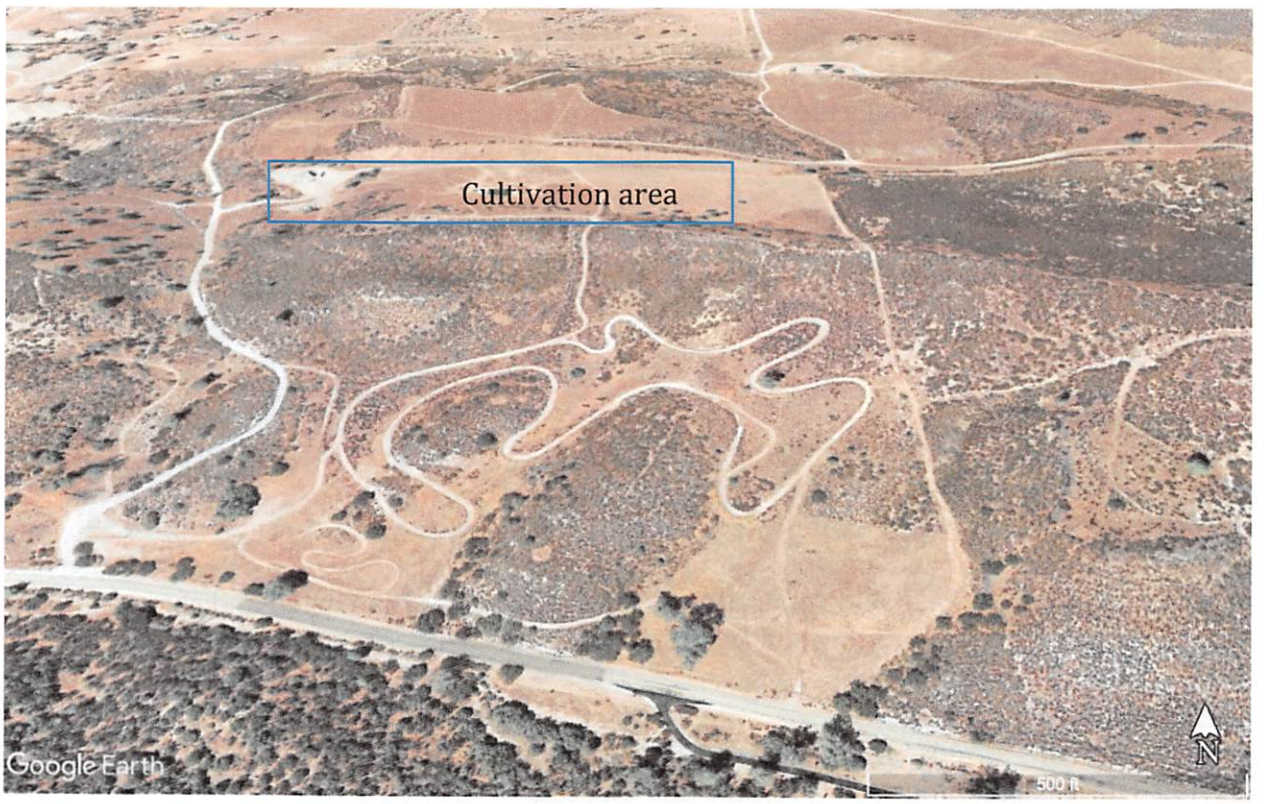
The project site is located on an approximately 130-acre APN 037-391-030 at 248 Carrisa Highway, Santa Margarita, San Luis Obispo County. The site is mostly vacant with one 2,400 sf metal barn on a 0.4-acre graded pad in the north-western portion with existing septic tank, and a water basin to the south of the central project site. There is a graded access road traversing the project site from west to east and north to south and evidence of recent tilling in the central and eastern portions of the project site. Topography is irregular and there are ridges to the north and south that slope gently downhill to the existing east-west trending dirt access road along the northern edge of the project site. The site plateaus near the center, sloping downhill to the east and west. Approximately 1.2 acres of the proposed project consists of the existing access road that extends approximately 0.35-mile north from Carrisa Highway to the entrance gate. Project site elevations range from 1,605 to 1,718 feet above mean sea level (msl).

Photos: View of existing driveway from HWY58 (left)

Existing metal barn (above)

Soils on the project site are diverse and consist mostly of Oceano loamy sand (37%), deep, excessively drained soils that formed in material weathered from sandy eolian deposits and typically occur on rolling dune-like topography with slopes up to 50%. Arnold loamy sand (33%) is present in the northwestern corner of the Project site and consists of deep, somewhat excessively drained soils that formed in material weathered from soft sandstone. This soil type is found on hills and uplands with slopes ranging from 9 to 75 percent. Gaviota-San Andreas association soils (18%) are present in the southern extent of the access road and consist of sandy loam weathered from sandstone. This soil type is found in mountainous area with slopes of 30 to 75%. Arnold-San Andreas complex soils (10%) are present in the central portion of the access road and are like Arnold soils but composed of slightly coarser material. (USDA 2019) (Figure 3 in the attached biology report).

The project site has a history of equipment storage and private recreational use preceding 1994 as well as disking as recently as 2017. Surrounding land uses include undeveloped natural areas in all directions, unpaved dirt access roads, and rural residential approximately 0.25-mile northeast and 0.5-mile east.



BACKGROUND

The landowner is 248 Carrisa, LLC. A new agreement has now been created where 248 Carrisa LLC leases to RP Agrochemix, Inc. RP Agrochemix Inc. is the new applicant of record. Lease and deed (title report) documentation is attached hereto.

PROJECT DETAILS

According to County of SLO LUO Section 22.40, both outdoor/indoor cannabis cultivation activities are allowed on AG land subject to a Minor Use Permit and additional requirements set forth in that section. A minimum of 25 acres within the Agriculture land use category is required to host a maximum 3 acre outdoor cannabis cultivation. Outdoor cannabis cultivation will occur onsite within a 2.6 acre distinguished outdoor canopy and protected by fencing. There is an existing 2,400sf metal ag exempt barn that is proposed to be converted to ancillary processing. County standards also allow an ancillary nursery so long as it doesn't exceed 25% of the proposed outdoor canopy area. There is a 112,320sf outdoor cannabis canopy proposed which would allow

up to a 28,080sf nursery. The applicant is proposing a +/- 5,760sf nursery within two hoop houses (30x96').

Outdoor Cultivation

The applicant is proposing to establish a 2.6-acre canopy for outdoor cultivation. There is an open area near the northern section of the site. This area also has existing ag roads nearby that can service the new use. This area is the most logical and environmentally superior choice as it is open and sheltered by a ridge that divides the planting site from any views from HWY 58. The remainder of the site has slopes that exceed 15% and are occupied by chaparral and oak trees that were strategically avoided.


Photo: Hoop house example

The site for cultivation is vacant and tilled. Outdoor cultivation will occur in hoop houses that will be oriented east/west and plants will be planted inground.

Land Preparation

The ground is prepared by first disking three times, chiseling (ripping) 3-feet four times and disking again three times. Six tons of well-composted organic green-waste (manure) is applied and incorporated into the soil coincident with the disking operations. Planting beds are then listed and shaped and filled in with happy frog potting soil & liquid fertilizers.

Plant Stock

Several cannabis strains are selected for high yields and high oil production quality. A mix of stains for each specific site is selected and planted.

Planting

Cannabis is planted by hand in early June (they can be planted later, but later plantings produce lower yields). Two plants are spaced 3-feet apart o 5-foot-wide raised beds (which are spaced 3-feet apart, edge-to-edge). Every 5 feet, two more plants are similarly placed. This results in a total of plant density of 2,178 plants per acre. Labor required for planting is estimated at 24 man-hours per acre.

Trellising

Each acre of cannabis production operation will have 22 rows per acre on 8-foot rows (square acre basis is 200 ft x 218 ft). A trellis system is installed each year.

Training/Pruning

Plants are trained and pruned on a limited basis during the growing season.

Plant Nutrition

Applications of N-P-K fertilizers are based on soil ad tissue tests, which quantify fertility needs and determine a fertilizer program. Normally, in addition to the soils samples and composted organic green-waste (manure) discussed above, a 15-15-15 fertilizer is applied at 400 pounds per acre and incorporated into the beds when shaped prior to planting. Gypsum may be incorporated into the soil at the rate of 2 tons per acre.

Irrigation

A drip irrigation system is installed prior to planting, with drip lines placed beneath the bed covering. Irrigation water is sourced from groundwater aquifers through agricultural wells. Well water is pumped using electrical power. All irrigation is applied through the drip system to match crop evapotranspiration and to account for 85% irrigation efficiency. The drip system requires chemical flushing to retard calcium build up and emitter clogging. Chemical flushing is performed after harvest with N-pHuric acid applied through the drip system with 0.5 acre inch of water. Two drip irrigation tape lines are installed per row. Beds are covered with plastic mulch using a mulch laying implement.

Plant Establishment

Prior to planting, a slotting implement is used to open the plastic mulch at appropriate intervals to prepare for transplanting. Uniquely identified ('Track-and-Trace' tagged) cannabis plants are delivered to the field edge and then transplanted into two rows, 36-inch rows, 36 inches apart. Fields are irrigated with roughly 1.5 acre-inches of water immediately after planting. Maxi Crop Seaweed Extract may be applied at 2.5 pounds-per-acre to ensure that a balance of nitrogen, phosphorus, and potassium (NPK) and micronutrients are supplied to the plants.

Pest Control Adviser/Certified Crop Advisor (PCA/CCA)

Written recommendations are required for many pesticides and are available from licensed pest control adviser. In addition, the PCA/CCA or independent consulting will monitor the field for agronomic pest problems including irrigation and nutrition, which would include a nitrogen management plan. During the vegetative growth period weekly applications of organic fungicides, e.g. Bacillus thuringiensis [Bt] and pesticides are applied per the PCA/CCA recommendation. Cannabis cultivators who are licensed by the CDFA are required to be comply with pesticide laws and regulations as enforced by the California Department of Pesticide Regulation (CDPR) and the County Agricultural Commissioners (CAC). Vertebrates are controlled with physical barriers, traps, and repellents castor oil and geraniol. The CDPR provides a list of allowable cannabis fertilizers and pesticides which will be referenced and applied onsite (CDPR list attached).

Yields

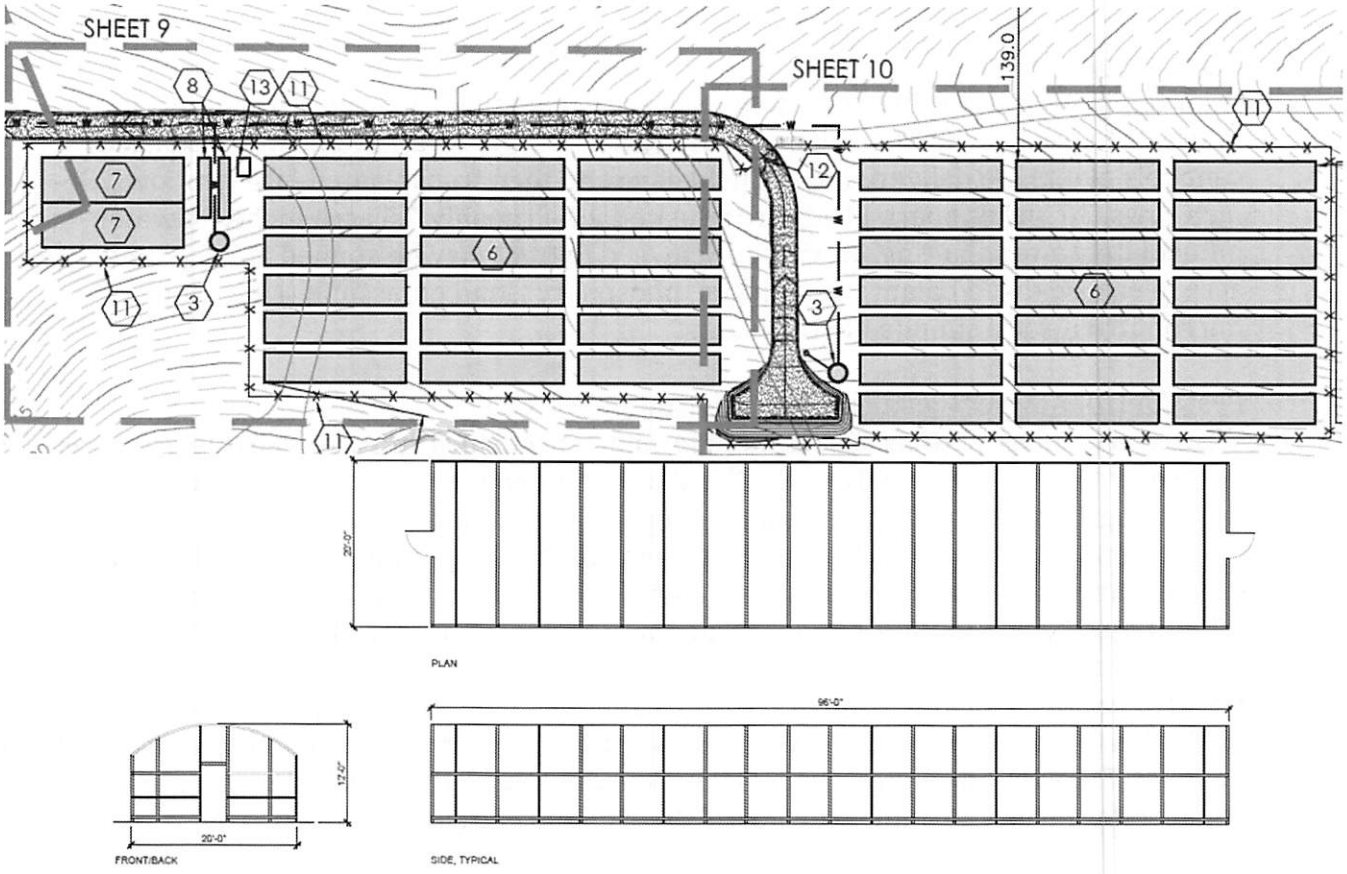
An estimated season yield of 5,445 pounds per acre is used to reflect yields under sub-surface drip irrigation. The yield will vary based on strain selection and planting date. An average of 2.5 pound-per-plant is estimated for the above density.

Harvest

The crop is harvested three times a year (May, July and October). Harvest occurs within a 24-hour period. Crew size is an additional 6 people with time to cut each plant calculated at 2 minutes. The flowers of the plant are removed from the stalks and then moved to the dry room. Fresh plant material is then vacuum-packed and may be stored in the existing barn or immediately transported to an oil extract facility.

Hoop Houses

A total of 39 hoop houses are proposed for outdoor cultivation, which equates to a 112,320sf canopy. Each hoop house is 30' wide and 96' in length with a 12' height. The hoops are oriented east to west and have 6' space aisles in between. The hoop areas are in two sections (18 on the west side and 21 on the east side), divided by a center access road. This 16' wide new access road provides a central vehicle access and turn around.

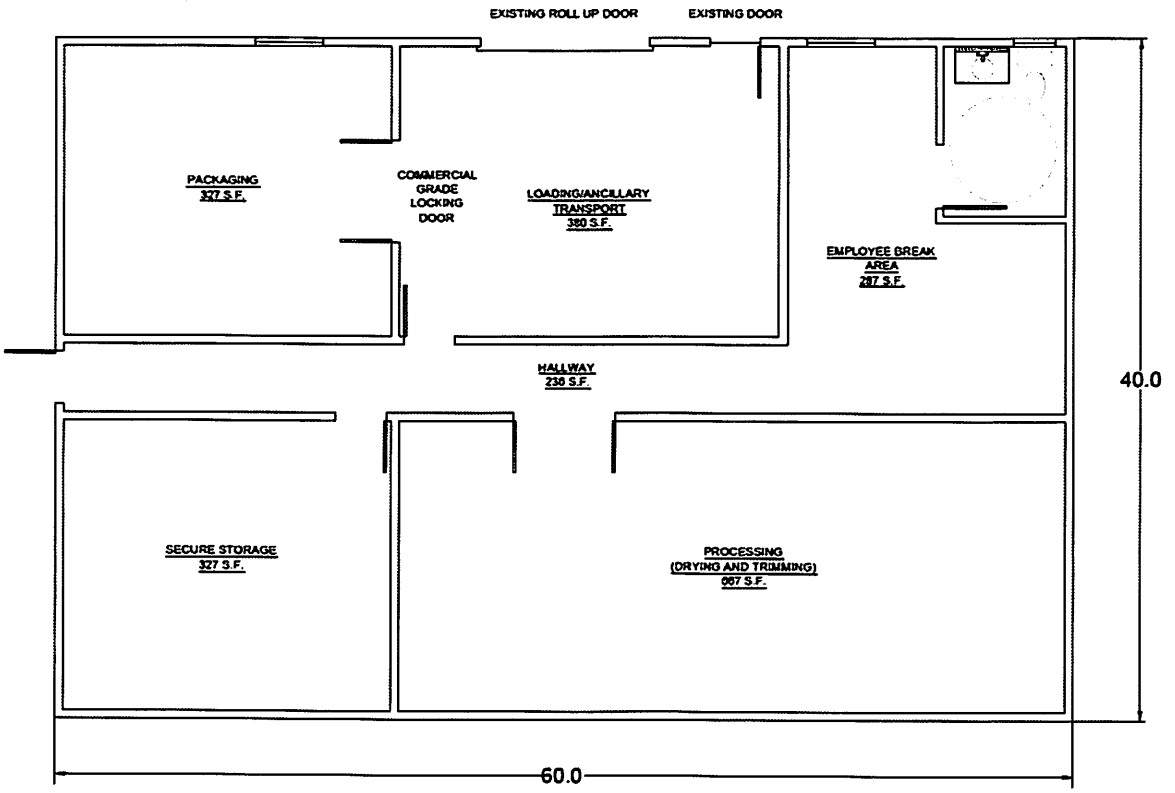


OUTDOOR CULTIVATION HOOP HOUSE FLOOR PLAN AND ELEVATIONS

Ancillary Processing

Ancillary processing of cannabis can be processed on-site so long as it is the cannabis that is grown onsite only, and is within a non-residential structure. The processing area is 667sf and will be located inside the existing 2,400 sf structure. Trimming and drying activities make up the processing area. The existing structure will need to undergo conversion to permit the structure as a commercial use before this activity can take place inside.

Additional activities within this structure include: packaging, loading/ancillary transport, a secure storage room and an employee breakroom with hallway access to each activity are listed above. Refer to floor plan attached and below for additional detail.



2,400 SF Barn Conversion to Cannabis Processing/Packaging/Transport Uses

- Ancillary Processing (Drying and Trimming Room) – 667 SF
- Packaging Room- 327 SF
- Secure Storage Room- 327 SF
- Loading and Ancillary Transport Room- 380 SF
- Employee Break Room – 287 SF
- Hallway – 236 SF

Ancillary Transport

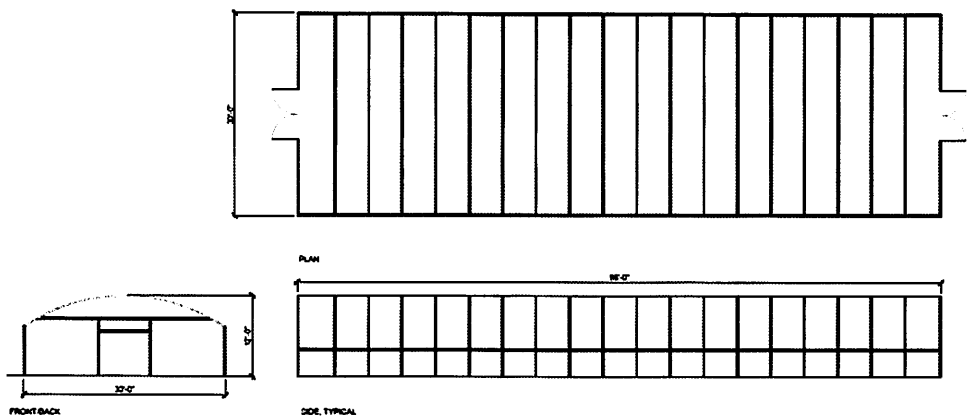
This application includes the request to have the ability to transport the onsite product for sale to an offsite location during harvest (Type 11 license). Vehicles will access the site and will be driven by licensed RP Agrochimex, Inc. employees and/or supervisor. There will be one designated

employee that will be on call during the normal season for transport only services (refer to employee schedule page 13, this employee is included in the total employee staff proposed). Trips will be made once a week and will be scheduled at different times and or days. The vehicle intended for transport is a 2020 Mercedes-Benz sprinter van (or the like) which will be equipped with a "cage" so that it is secured to the inside of the vehicle and has a dedicated Global Positioning System (GPS) device for identifying the geographic location of the transport vehicle.

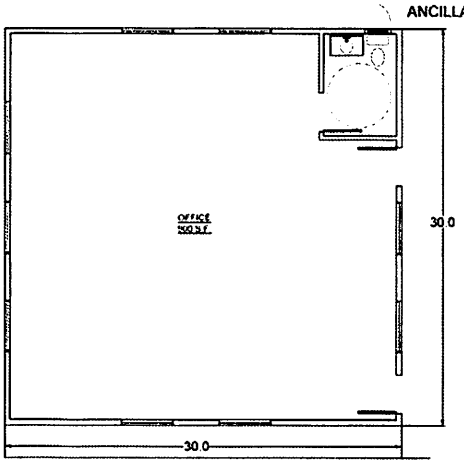
Personnel will back into the processing structure through an existing loading door. The vehicle will pull in and load product with locked doors behind and only allowed employees present. Once loaded it will be transported to a licensed facility and/or distributor.

Ancillary Nursery

A +/- 5,760 sf nursery is proposed adjacent to the outdoor cultivation area. This area will be made up of two 30'x96' hoop houses (identical to outdoor cultivation hoops depicted on previous page) that will enclose cannabis clones and seedlings which will be potted. The cannabis clones/seeds are at their infancy and will be relocated onsite where they will reach full maturity. This is an ancillary nursery so these young plants will not be sold to other licensees and will only be utilized onsite. Refer to the attached site, floor plans and elevations for additional information.



ANCILLARY NURSERY HOOP HOUSE FLOR PLAN AND ELEVATIONS



Office

A new 900sf office building is proposed to be located on an existing pad across from the barn, refer to site plan. The office building will most likely be prefabricated (but on permanent foundation) as shown in the elevation picture, refer to floor plan and elevation. The office building will have space for administrative uses that will provide security oversight and overall operations. There will be a restroom that will connect to an existing septic system and leach field, refer to site grading plan and attached existing septic verification document from the County of SLO.

Fencing
Fencing will be compliant with state regulations for security purposes through a combination of hoop house walls and perimeter fencing (6' height, solid fence type). Fencing locations are noted on the site plan (sheet 3,9 &10)

Lighting
Exterior lighting is proposed for security. Lights will be designed to minimize outdoor environment impact. As such, the design criteria will be:

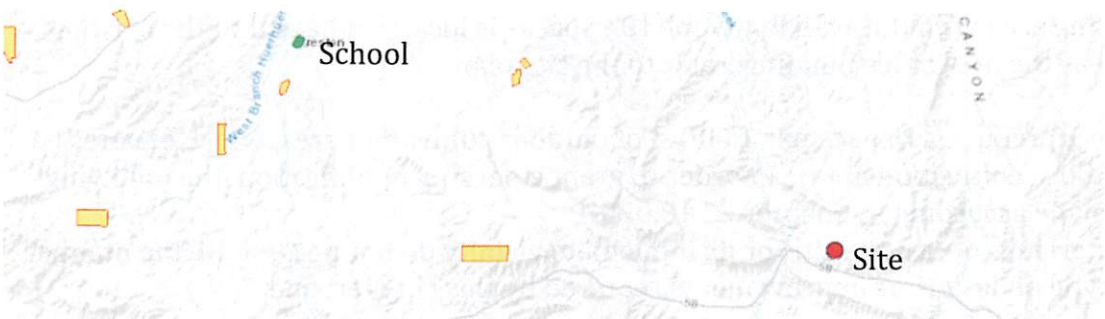
- 10' mounting height, pole mount (in-line with fence), downlit.
- Two (2) directional light fixtures per pole and cameras to match light coverage.
- Light fixtures aimed downward and shielded to eliminate off-site glare and meet dark sky performance criteria.
- Motion sensor activated.
- No more than 10 foot-candle intensity at ground level average.

Note - Applicant plans to install solar panels to generate some, if not all, of their own electricity.

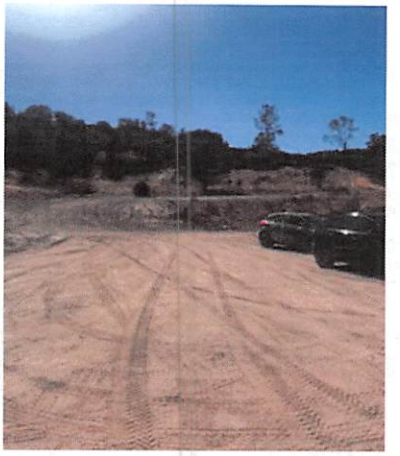
An updated security plan with lighting locations has been provided along with an updated narrative (separate attachment).

Site Context

Neighborhood Compatibility
Graze land and vacant properties surround the site. There aren't any schools; alcohol or drug facilities within 1,000 feet of this subject property. The nearest source is over +67,000 feet away and is the Creston Elementary School. The nearest residence, outside of ownership is +2,500' to the northeast of the cultivation area.



Access



Existing access is taken off of Carissa Hwy, HWY 58. There is a gated, gravel driveway that currently serves the site and adjacent neighbor (northeast) who has an easement over the subject site's property (refer to attached Preliminary Title Report -Order No. 58601903716-CB).

The driveway approach will need to be improved to Cal Trans and County of San Luis Obispo Public Works B-1e standards as suggested in their review. The remainder of the driveway is approximately 16-20' wide and climbs uphill for +1,700' until the main gate to the cultivation area is reached. The main gate will be secured with a keypad entry and restricted to employees only. This main gate leads to the existing barn and remainder of the cultivation area. The main gate, at the operation site, will be restricted to employees only. Once past the main gate, the road will continue beyond the fencing and access the hoop houses.

Grading for access improvements will be necessary to meet Cal Fire standards.
Cal Fire will be visiting the site during project review and will provide recommendations for access and water supply for the cultivation operation. The driveway will be composed of an 8" Class II AB over 12" scarified native compacted to 90%, refer to grading plan. Access on the proposed site and grading plan, are designed to comply with Cal Fire standards. There is adequate space for a turnaround at the barn and a new hammerhead is proposed in between hoop houses. Widening improvements will require oak tree protection as noted on the grading plans sheets 4. No oak tree removals are necessary.

Parking

There is an existing flat area near the existing barn that is suitable for parking. There are 6 designated spaces at this location. This area can adequately more overflow parking during harvest. There is also a flat area near the new office building that can provide an additional 3 spaces for employees that will be ADA compliant. In total there are 10 designated parking spaces with additional area for overflow.

Parking Modification Request

A designated parking area with the availability for 10+ spaces is located adjacent to the existing metal barn, and near the new office building, refer to the site plan.

Section 22.18.050 (B) requires 1 space per 1,000 sf of outdoor cultivation area, which equates to 131 spaces (130,680 sf cultivation area). In order to grant a parking modification, the following findings must be made according to Chapter 22.18.020H:

a. The characteristics of use, the site, or its immediate vicinity do not necessitate the number of spaces, type of design, or improvements required by this chapter; and

b. Reduced parking or an alternative to the parking design standards of this Chapter will be adequate to accommodate on the site all parking needs generated by the use, or that additional parking is necessary because of special features of the use, site, or site vicinity and
c. No traffic safety problems will result from the proposed modifications of parking standards.

The characteristics of the proposed operation do not necessitate the number of parking spaces required by Chapter 22.18. At most there will be 10 employees total during harvest which occurs for a few days, five times a year. Car pool measures will also be implemented. A minimum of six employees will be onsite at all times overseeing the operation. No traffic safety problems will result from the proposed modification of parking standards. All parking is located adjacent to the cultivation site and structures.

Signage
No signage is proposed at this time.

Setbacks
Most of the cannabis activities proposed meet the majority of the required setbacks. The nursery is required to be situated a minimum of 100' from all property lines and the proposed nursery will exceed this requirement. Outdoor cultivation (hoop houses) are required to be setback 300' from all property lines. The hoop house location (outdoor cultivation) results in a setback modification request for the northern property line, refer to matrix below.

	PROPOSED SETBACK			
STRUCTURE	**FRONT**	**BACK**	**SIDE (WEST)**	**SIDE (EAST)**
E. Barn (office/dryroom/storage	1598'	97'	1130'	±1500'
Nursery	±1900'	139'	±1,300'	+1,000'
Hoop Houses Outdoor Cultivation	1,585'	139'	1427'	318'

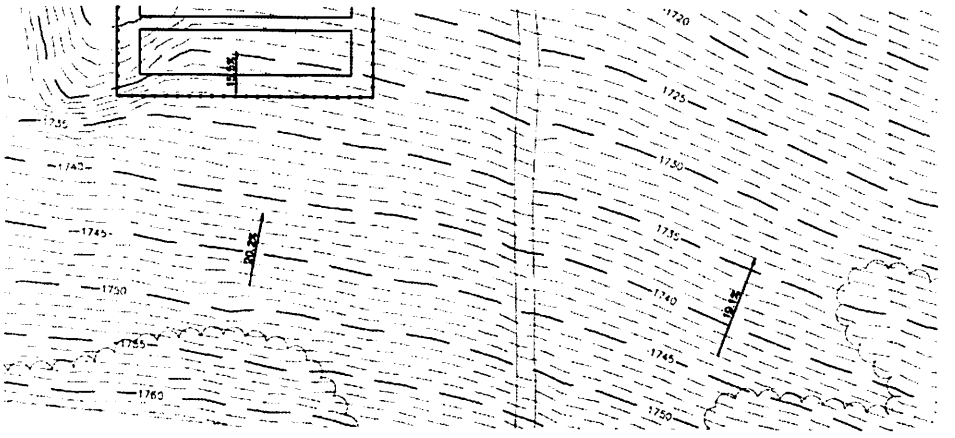
The nearest residence outside of ownership is +/-2,500 feet away to the northeast.

Modification Request
Per Section 22.40.050D.3.e setbacks can be modified through Minor Use Permit approval so long as the required finding can be made:

> "(For setback modifications only.) Specific conditions of the site and/or vicinity make the required setback unnecessary or ineffective. Modification of the setback will not allow nuisance odor emissions from being detected offsite."

The existing barn is just shy of the required 100' setback (96' feet proposed at northern property line). This structure is an existing permitted structure and the applicant is proposing its conversion to cannabis activity rather than build a new structure which would increase grading and environmental impacts.

The hoop house is situated in the upper west corner of the site. The location was chosen as it is next to an existing structure that will be utilized and is an area previously disturbed that will not impact sensitive resources. It will also prevent additional grading in other undisturbed areas. The location of the hoops are below 15%. Topography increases quickly up to 20% and beyond south of the hoop locations, refer to slope illustration below. If the hoop location were to be pushed any further south, it would require significant grading and invade the tree line and chaparral vegetation. Odor management will also be implemented to mitigate any nuisance should it arise, refer to odor management plan. In conclusion, the hoop layout encroaches the required 300' setback from the northern property line in order to avoid tree removal and additional grading impacts on slopes over 15%. These specific conditions and placement justify the setback modification request based on the increase of environmental impact that could occur should the placement meet the setback and move upslope to the ridgeline. An odor management plan with indoor carbon scrubbers and onsite management has been proposed to prevent odor emissions being detected offsite, which constitutes another setback medication finding.



OPERATIONS

The following information discusses additional site's operational compliance with the requirements set forth in Section 22.40.040.

Operation Hours/Shifts

The site requires a total of 5 full-time staff with the hours of 6:30 am to 6:30 pm (Transportation will be made within our operating hours). These full-time staff members will have set shifts, see diagram schedule below.

Three times a year, in May, July and October for harvest, 5 additional part-time employees will be onsite for a total of 11 with hours of operation from 6am to 10pm. These harvest times are six days

long where cannabis is cut and hung. A regular (normal schedule) full time schedule is provided below as well as harvest schedule to show those part time employee's estimated schedule.

<u>Estimated Employees list (5 full-time employees)-(6-Part Time Harvest)=11 during Harvest</u>
3-Agriculture workers
1- Operation Manager
1-On call Transport driver
Harvest temporary crew +6 employees

Shift Schedule:

NORMAL SCHEDULE

Monday through Fri

For the Week of: DATE
Department Name: DEPARTMENT

Employee Name	6:30 AM	7:30 AM	8:30 AM	9:30 AM	10:30 AM	11:30 AM	12:30 PM	1:30 PM	2:30 PM	3:30 AM	4:30 PM	5:30 PM	6:30 PM	Sick?	TOTAL
Employee 1	manager	manager	manager	manager	manager	manager	manager	manager							
Employee 2									manager	manager	manager	manager	Manager		
Employee 3			Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator							
Employee 4									Cultivator	Cultivator	Cultivator	Cultivator	Cultivator		
Employee 5						Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator		
Employee Transport	ON call for transport														

HARVEST SCHEDULE

Monday through Friday

For the Week of:
Department Name:

Employee Name	6:30 AM	7:30 AM	8:30 AM	9:30 AM	10:30 AM	11:30 AM	12:30 PM	1:30 PM	2:30 PM	3:30 AM	4:30 PM	5:30 PM	6:30 PM	7:30 PM	8:30 PM	9:30 PM	10:30 PM
Employee 1	manager	manager	manager	manager	manager	manager	manager	manager									
Employee 2									manager	manager	manager	manager	Manager				
Employee 3			Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator									
Employee 4									Cultivator	Cultivator	Cultivator	Cultivator	Cultivator				
Employee 5						Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator	Cultivator				
Employee 6(PART TIME)	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW											
Employee 7(PART TIME)							HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW					
Employee 8(PART TIME)													HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW
Employee 9(PART TIME)													HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW
Employee 10(PART TIME)	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW											
Employee 11(PART TIME)							HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW	HARVEST CREW					

Employee Safety and Training Plan
The operations will be enforced by an Employee Safety and Training Plan. Its role is to properly ensure the safety of the site and their employees. The Employee Safety and Training Plan is provided as a separate document.

Security

Site security will be provided by a state approved system and will be monitored by a designated employee. High definition cameras will be installed at high points overseeing gates, access and ingress and egress of the structure and hoop houses. Public access is restricted and will be achieved with the installation of two security gates, one of which will include a keypad and intercom. Both camera and gate locations are identified on the attached security plan. Fencing and lighting installation (downlit, motion lights) are proposed and details are found above under the 'outdoor cultivation' section of this project description and in the attached security plan.

Limited access protocol and areas

All cannabis activity areas have limited access. Some areas are more sensitive than others for safety, theft and other security purposes. As such these areas are rated ("low", "moderate", "high" or "very high") and have employee and personal limitations and security protocols as summarized below.

1. Nursery- (Low)-Cannabis plants are grown inside; however, they are immature plants (no flowers) or mature ('wet') and undried-not for consumption. The area is limited to cultivation and nursery employees and their supervisor (s) only. No other employees may handle plants at any time.
2. Outdoor Cultivation- (Low)- Cannabis plants are grown outdoors but under the hoop house structures and enclosed with 6' solid fencing. The area is also screened by existing topography. Regardless of low visibility, this cultivation area is limited to cultivation and nursery employees and their supervisor (s).
3. Cultivation Processing (Drying/Trimming) room (Low)-The processing room involves both drying and trimming of cannabis plants and is proposed within the existing metal barn. The drying room, where harvested plants are hung dry in a humidified room. Trimming will take place adjacent. This room will be limited to cultivation and nursery employees and their supervisor (s).
4. Cultivation Packaging- (Very High) The packaging room takes the dried and trimmed cannabis product and sorts, weighs, packages and labels for tracking and transport. This area is considered 'very high' since the product is in process and ready for sale and is at higher risk for theft. This area may only be accessed by supervisors and select employees.
5. Cultivation Transport (Very High)- The transport/loading room will be loading inventory ready for sale and to be transported off-site. This area is also considered 'very high' as the product is ready for sale and at a high risk of theft. This area may only be accessed by supervisors and select employees.
6. Secure Storage/Inventory Room- (Very High)- This room will have a commercial grade locked door and will have packaged and labeled inventory for sale, packages not ready for sale and in-process materials. The area will also have a secured compartment that houses

computer hardware and surveillance information. This area may only be accessed by supervisors and select employees.

These additional security measures will be implemented with employee safety and training as well as employee identification (badges) and onsite security screening.

Fire Safety
Cal Fire input will be provided in their project referral. As a result, the project has been designed to accommodate these fire safety measures, as discussed previously in this document under 'Access' improvement discussion.

Three, 5,000 gallon steel water storage tanks are proposed on the site for fire safety and to support the proposed cultivation (refer to overall site/grading plan sheet 3 of 11). Accordingly, the tank to serve the cultivation will have a booster pump and a nutrient injection system. Commercial fire sprinkler plans will need to be designed and reviewed by Cal Fire during the building permit review process.

Odor Management
The nursery houses immature plants which will not flower and create an odor nuisance. However, the applicant went beyond measures and has prepared an odor management plan, attached.

Outdoor cultivation is pushed to the opposite side of the parcel furthest away from the nearest neighbor (located to the west ±2,500 ft. away).
Odor management onsite will be implemented by an onsite manager at all times. The manager contract will be provided to the immediate neighbors (abutting the subject site property lines) to be available for any nuisance complaints or inquiries.

Pesticide and Fertilizer Application
A list of pesticides and fertilizer products are included in the land use permit application. All products are non-hazardous and in compliance with the Department of Pesticide Regulation (DPR) and the County of San Luis Obispo Agricultural Commissioner (CAC). The site soils were analyzed for optimal plant growth and from this, pesticide and fertilizer recommendations were suggested, see below and attached document.

Storage of these products will meet will be located in a 8'x40' cargo container east of the ancillary nursery (refer to site plan sheet 3 of 11).

ANGLE
LAND USE ENTITLEMENT

RECOMMENDED PRESCRIPTIVE AGRONOMIC FORMULATIONS BASED ON SOIL ANALYSIS

[illegible] contact Matt Welch (tech@profileproducts.com) regarding these [illegible]

	Soil Neutralizers						Growth Stimulants				Biotic Soil Media™	
	Aqua-pHix™ [1]		NeutraLime™ [2]		Agricultural Lime[3]		JumpStart™		BioPrime™		ProGanics™	
Sample	gal/ac	L/ha	lb/ac	kg/ha	lb/ac	kg/ha	gal/ac	L/ha	lb/ac	kg/ha	lb/ac	kg/ha
1	0	0	0	0	---	---	5	47	160	179	5000	5600

Notes: 1 Aqua-pHix is also available in a granular form, please contact Tech@profileproducts.com with questions. 2. NeutraLime is also available in a liquid form, please contact Tech@profileproducts.com with questions 3. Based on 100% Calcium Carbonate Equivalent tilled in to a depth of 6in.

FERTILIZER RECOMMENDATIONS

	Crop Yield or Turf / Ornamental Code	Gypsum		Sulfur		N		P_2O_5		K_2O	
Sample		lb/ac	kg/ha	lb/ac	kg/ha	lb/ac	kg/ha	lb/ac	kg/ha	lb/ac	kg/ha
1	TURF	0	0	0	0	130.7	146.5	0.4	0.5	122	136.7

Hazard Response Plan

RP Agrochimex, Inc. will implement Best Management Practices (BMP) in the handing of chemicals and fertilizers.

The following spill and leak prevention and response measures will be implemented:

- Establish procedures and/or controls to minimize spills and leaks;
- Develop and implement spill and leak response procedures to prevent industrial materials from discharging through the storm water conveyance system. Spilled or leaked industrial materials will be cleaned promptly and disposed of properly;
- Identify and describe all necessary and appropriate spill and leak response equipment, location(s) of spill and leak response equipment, and spill or leak response equipment maintenance procedures; and
- Identify and train appropriate spill and leak response personnel.

Spill clean-up materials, material safety data sheets, a material inventory, and emergency contact numbers will be maintained and stored in designated area and containers.

The following preventative maintenance measures will be implemented:

- Fueling in the designated area • Daily inspection of mechanized equipment for lubricant and fuel leaks;
- Identify all equipment and systems used outdoors that may spill or leak pollutants;

• Regularly observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks;
• Establish an appropriate schedule for maintenance of identified equipment and systems; and
• Establish procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks.
• Drip pans or absorbent pads will be used for all vehicle and equipment maintenance activities that involve grease, oil, solvents, or other vehicle fluids.

FERTILIZER APPLICATION (BMPs)
The following are best management practices used in application:
• Plant cover crop to boost soil fertility and protect from storm events • Follow the manufacturer's suggested application rates
• Contain any spills immediately
• Prevent off-site drift with hedges placed around the grow site
• Do not spray directly on surface water to allow fertilizers to drift to surface water Spray only when wind is blowing away from surface water
• Install buffer strips, bio-swales, or vegetation down slope of cultivation site to filter runoff of chemicals from irrigation
• Use safe pesticide alternatives recommended by Department of Pesticide Regulation
• Implement Integrated Pest Management practices to avoid the need for pest control
• The use of fertilizer shall not occur within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.

FERTILIZER STORAGE (BMPs) The following are best management practices used in storage:
• Ensure fertilizers are properly labeled and stored to avoid contamination through erosion, leakage, or inadvertent damage from rodents, pests, or wildlife
• Establish and use a separate storage area for fertilizers
• Ensure all such storage areas shall comply with the riparian setback requirements, be in a secured location in compliance with label instructions, be located outside of areas of known slope instability, and be protected from accidental ignition, weather, and wildlife
• Ensure storage areas have appropriate secondary containment structures to protect water quality and prevent spillage, mixing, discharge, or seepage
• Store any chemicals in a secure building or shed to prevent access by wildlife
• Store all products that impact water quality in a manner that does not allow for runoff to surface waters
• Segregate acids from bases; segregate inorganic oxidizing acids (e.g. nitric acid) from organic acids (e.g. acetic acid), flammables, and combustibles
• Segregate acids from water reactive metals such as sodium, potassium, and magnesium
• Store corrosives on lower shelves at least below eye level and in compatible secondary containers, and will not store corrosives on metal shelves
• Store dry powder and granular fertilizers in moisture-proof plastic tubs or containers
Procedures will ensure all employees and managers are trained to adhere to the following best management practices at the cultivation facility. Each employee will be trained on the following:

- Acute, chronic, and delayed effects of fertilizers • Sensitization
- Routes by which fertilizers can enter the body • Emergency first aid for fertilizer overexposure
- How to access emergency medical care
- Decontamination procedures
- Spill cleanup
- Importance of showering with soap and warm water
- Compliant use of fertilizers • How to use Personal Protective Equipment
- Heat illness prevention, recognition, and first aid
- Safety requirements and procedures for handling, storing, transporting and disposing
- Warning against taking fertilizers and/or fertilizer containers home
- Triple Rinsing
- Proper disposal practices
- All necessary personal protective equipment will be available, clean, and properly stored
- Fertilizer application equipment shall be properly calibrated

Fertilizer wastes shall not be disposed of on the ground, into or near water, or into storm drains, or septic tanks. Fertilizer containers, including empties, will not be left unattended, handled, emptied, stored or disposed of in a way that would create a hazard for people animals including bees, food, feed, crops or property

Pesticide Usage (BMPs)

In the case, all preferred methods of pesticide prevention and eradication have proven unsuccessful, the following are best management practices for pesticide use:
Follow all labels and directions before, during and after the use of pesticides
Do not over apply pesticides are prepared and loaded on an impermeable pad at least 200 feet away from surface water bodies
Do not apply pesticides when pollinators are present
Do not spray directly into surface water and only spray when wind is blowing away from surface water bodies
When possible, use naturally insecticidal plants around or throughout a grow to repel a variety of flying insects and pests.
The use of pesticides shall not be located within 100 feet of any spring, top of bank of any creek or seasonal stream, edge of lake, delineated wetland or vernal pool.
If there is a spill or accidental discharge in or on any waters of the site, immediately notify the County Office of Emergency Services so that the local Health Officer can decide what actions, if any, may need to be taken to protect public safety. During business hours: 805-781-5544. After Hours: HAZMAT SPILL NOTIFICATIONS 1 (800) 852-7550 or (916) 845-8911

Worker protection (BMPs)

When pesticides are used, the EPA's Agricultural Workers Protection Standard will be enforced by:
Providing protections to workers and handlers from potential pesticide exposure
Providing training on the safe use of pesticides.
Providing training on how to avoid exposures to pesticides

Provides Training to identify pesticides exposure symptoms and how to respond and manage exposures to pesticides if they occur.
Pesticides covered by San Luis Obispo County Regulations, if used will be applied only by the owner of the cultivation operation, or if applicable, by a worker trained per County AG department regulations.

Pesticide Storage (BMPs)
The following are best management practices for pesticide storage:
Pesticides shall be properly labeled and stored to avoid contamination through erosion, leakage, or inadvertent damage from rodents, pests, or wildlife.
Pesticides are kept in their original containers and the containers are stored in a building, to prevent exposure to sunlight and precipitation and access to wildlife, with secondary containment in the case of leaks or spills.
Pesticides must be stored in a designated cabinet, separate from any incompatible materials.
Separate storage areas are dedicated to pesticides, fertilizers, and petroleum products so they are all stored separately.
Recycle empty pesticide and pest management containers - never burn or dispose of containers by dumping.
Data safety sheets for all pesticides and will be maintained at all times. Chemical and pesticides will be stored in a dedicated structures with appropriate warning signs.

Waste Management Plan
Per California Code of Regulations Title 14, Chapter 31, organic cannabis solid/liquid waste is to be composted. Organic waste includes leaves, stalks, and any plant materials destroyed. There will be a compost area behind of the barn and will be enclosed (6' chain linked fence with gate and lock) and can only be accessed by a small tractor and employees. The composed material will be re-tilled back into the land.

Any liquid waste that cannot go into the compost area will be trucked offsite by an employee and will be required to comply with the Bureau of Cannabis emergency control regulations. Documentation of such deliveries will be documented in a log with receipts.

Liquid domestic waste, for normal employee restroom use, will be treated by an existing septic tank that has been inspected and certified by SLO County Building Department (see attached certificate copy and septic location is noted on the site plan).

Regular trash and recycle bins will be collected by the local waste management company. No cannabis green or liquid waste will be allowed to be in these containers.

Environmental

Traffic

The proposed operation is indicative of other agricultural operations in the county. Working hours have been designed for the safety of the employees, and the avoidance of peak traffic hours.

Working hours range from 6:30am to 10pm. Duties will occur in shifts. During sustained operations, at most a team of six will be employed on-site. Planting and harvesting will take 2 days each, five times a year with an additional temporary team of 5 people. Transportation of the product will occur during harvest and most likely the same goes for the nursery trips. Refer to employee shift schedule for anticipated shifts/trips (page 12).

Air Quality

Dust Control

The access road will be compacted per grading plan and access road discussion page 10. Dust suppression measures will be applied to this access road for construction and operation mitigation. Access roads will include a speed limit to 10mph to keep dust at minimum. The project will be conditioned as such. Additionally, the cultivation area will be ripped, disked just after the rainy season to strategize for cultivation. Onsite roads will also implement dust control measures in compliance with the Air Pollution Control District's CEQA Handbook Section 3.6.3.

Water Management Plan

Proposed water supply, use and conservation measures are provided in the project's water management plan prepared by the Wallace Group. Wallace Group based their cultivation water use rates based on the Central Coast Regional Water Quality Control Board's cannabis development teams estimates of 0.03 gal/sf canopy/day for outdoor cannabis plants and an application rate of 0.1 gal/sf of canopy for indoor purposes. The project eliminated the indoor cultivation area, so it is now estimated to yield 2.32AFY. Estimates are represented in the tables below.

Table 1: Annual Water Demand Estimate

Use	Rate	Gross Demand (gallons/ year)	Gross Demand (AFY)
Outdoor Cultivation: 3 Acres (130,680 sf)	130,680 square feet canopy area x 0.03 gal/sf/day x 150 days	588,060	1.80
Nursery: 5,760 sf	5,760 sf canopy area x 0.1 gal/sf/day x 260 days	149,760	0.46
Administration/Office	5 full-time employees x 10 gpcd x 365 days	18,250	0.06
Total Water Demand			2.32 AFY

Biological

A biological resource assessment with a San Joaquin Kit Fox habitat evaluation has been completed by PAX Environmental, Inc.. The results from the report's executive summary is stated below:

No sensitive vegetation communities or wildlife were identified during the survey. Records searches identified a total of 43 special-status botanical species and 23 special-status wildlife species that occur in the Project region. Of those identified, 2 special status plant species and 11 special status wildlife species, as well as migratory nesting birds, were identified as potentially occurring on the Project site.

The project has been designed to avoid impacts to sensitive biological resources. However, there is potential for direct and indirect impacts to occur due to the potential for special status wildlife species in the Project area. Mitigation measures have been recommended that are expected to reduce potential impacts to a less than significant level.

Recommended mitigation measures can be located on pages 25-33 of the attached biological resource assessment.

MEMORANDUM

WALLACE GROUP®

CIVIL AND TRANSPORTATION ENGINEERING

CONSTRUCTION MANAGEMENT

LANDSCAPE ARCHITECTURE

MECHANICAL ENGINEERING

PLANNING

PUBLIC WORKS ADMINISTRATION

SURVEYING / GIS SOLUTIONS

WATER RESOURCES

Date: December 23, 2019

To: RP Agrochimex, Inc.
248 Carrisa Highway
Santa Margarita, CA 93453

From: Shannon Jessica, PE

Subject: Water Use Evaluation for Proposed Cannabis Cultivation (248 Carrisa Hwy, Santa Margarita, CA)

Wallace Group has been retained to estimate the water demand for a proposed cannabis cultivation operation in San Luis Obispo County. The proposed cultivation, located at 248 Carrisa Highway in Santa Margarita (APN: 037-391-030), includes the following:

- Outdoor/Hoop House Cultivation – 3 acres total
- Administration office space - 900 sf
- Barn for processing – 2400 sf
- Nursery – 5,760 sf

The recently adopted Cannabis Land Use Ordinance for San Luis Obispo County requires that applicants submit a detailed water management plan as part of the application package. The water management plan shall include proposed water supply, proposed conservation measures, and any water offset requirements. The following memorandum has been developed to outline the proposed water demand, and associated offset, if required, for the proposed development.

While published water use values have not yet been consistently established in the industry, the Central Coast Regional Water Quality Control Board (RWQCB) cannabis development team uses an estimate of 0.03 gal/sf canopy/day for outdoor cannabis plants and an application rate of 0.1 gallons per square foot of canopy for indoor cultivation operations. As defined in the San Luis Obispo County Cannabis Ordinance, hoop houses are considered outdoor cultivation whereas greenhouses are considered indoor cultivation. According to the SLO County Ordinance, nursery cultivation is categorized as indoor and therefore the indoor water application rate is used. The outdoor cultivation season is proposed to be 150 days. 260 days per year is used as the indoor growing season, corresponding with a 5-day per week watering schedule. The water use values presented in this report are estimates based on the above-mentioned application rates. Actual water use will be monitored daily and reported, as required by the County.

Table 1 outlines the proposed annual water demand for this project. Table 2 extrapolates the annual values into proposed monthly water use estimates, based on local evapotranspiration data.

WALLACE GROUP
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Table 1: Annual Water Demand Estimate			
Use	**Rate**	**Gross Demand (gallons/ year)**	**Gross Demand (AFY)**
Outdoor Cultivation: 3 Acres (130,680 sf)	130,680 square feet canopy area x 0.03 gal/sf/day x 150 days	588,060	1.80
Nursery: 5,760 sf	5,760 sf canopy area x 0.1 gal/sf/day x 260 days	149,760	0.46
Administration/Office	5 full-time employees x 10 gpcd x 365 days	18,250	0.06
Total Water Demand			**2.32 AFY**

Table 2. Estimated Monthly Water Demand for Cannabis Cultivation

Month	ETo (in)**	Outdoor ETo During Growing Season (%)	Outdoor Cultivation Water Use/Month (AF)	Indoor Cultivation Water Use/Month (AF)	Admin water use/month (AF)	Total Water Use/month (AF)
October	3.33	-	0.00	0.04	0.005	0.04
November	2.19	-	0.00	0.04	0.005	0.04
December	1.36	-	0.00	0.04	0.005	0.04
January	1.44	-	0.00	0.04	0.005	0.04
February	1.78	-	0.00	0.04	0.005	0.04
March	2.78	-	0.00	0.04	0.005	0.04
April	3.35	9.5	0.17	0.04	0.005	0.21
May	6.13	17.3	0.31	0.04	0.005	0.36
June	6.15	17.4	0.31	0.04	0.005	0.36
July	8.15	23.0	0.42	0.04	0.005	0.46
August	6.15	17.4	0.31	0.04	0.005	0.36
September	5.47	15.5	0.28	0.04	0.005	0.32
Total	**48.28**	**100%**	**1.80**	**0.46**	**0.06**	**2.32**

**California Irrigation Management Information System (CIMIS) Weather Station #163; Templeton (active 2000 to March 2018)

WALLACE GROUP®

Water Supply & Offset

The proposed project will utilize an on-site groundwater well to supply water for crop irrigation. Water used for irrigation will be metered daily and monitored closely to ensure the system is operating efficiently and without leaks or line breaks. The location of this project is outside the boundary of the Paso Robles Groundwater Basin, therefore water offset is not required for the increased water demand corresponding to the development.

California Department of Fish and Wildlife

Because the project will be using an existing groundwater well for water supply, the owner will not need to obtain a General Agreement or Lake or Streambed Alteration (LSA) permit through California Department of Fish and Wildlife (CDFW). However, annual licenses for cannabis cultivation issued by California Department of Food and Agriculture (CDFA) will require the owner to demonstrate by written verification from CDFW that an LSA Agreement is not required. This is accomplished by submitting a self-certification application on the CDFW webpage and obtaining written correspondence from CDFW verifying that the LSA is not required for this project.

Regional Water Quality Control Board

Some cultivation activities can generate wastewater such as hydroponic solutions, irrigation tail water, and sanitation activities, etc. Typically, wastewater will be discharged either into a community collection system or to an onsite wastewater treatment system (septic tank/leachfield). These activities will be monitored through the Regional Water Quality Control Board for on-site disposal systems.

Regardless of the process wastewater discharge strategy, the RWQCB will require that cultivation operations enroll in the General Waste Discharge Requirements for Waste Associated with Cannabis Cultivation Activities (Cannabis General Order). The Cannabis Policy and General Order apply to commercial cannabis cultivation activities and enrollment in the General Order will be required for all commercial cultivation activities. Based on the proposed cultivation area and the characteristics of the property, it is likely this project will be categorized as a Tier 2, Low Risk according to RWQCB regulations. The tier determination will need to be finalized by the RWQCB once an application has been submitted and reviewed by Board staff. Tier 2 dischargers are required to submit a technical report to the RWQCB, due March 1 annually.

Coverage under the General Order is obtained by applying through the online application portal on the Regional Water Quality Control Board website. After the application is submitted and the application fee paid, the RWQCB will issue a Notice of Applicability (NOA). The NOA can be presented to the CDFA to obtain a commercial cannabis cultivation license. The application portal is located at: www.waterboards.ca.gov/cannabis.