Summary of Water Consumption for INDOOR, GREENHOUSE & OUTDOOR Cannabis Cultivation @
SIDIOFAX CUP
7575 CARISSA HWY., SANTA MARGARITA
Permit No DRC2019-00086
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 2.96 acre-feet/year** of combined indoor, greenhouse and outdoor cultivation water use, we do hereby take exception to the demand values this applicant has provided for this project as follows:

1) Our annual indoor water demand calculations project a 1.02 acre-feet/year demand (see attached).

2) Our annual greenhouse water demand calculations project a 3.06 acre-feet/year demand (see attached).

3) Our annual outdoor water demand calculations project a 0.95 acre-feet/year demand (see attached)

4) The plant demand alone for these cultivation areas would more realistically assess a combined total of 5.03 acre-feet of ACTUAL annual demand or a 51% 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

Summary of Water Consumption for INDOOR Cannabis Cultivation @
SIDIOFAX CUP
7575 CARISSA HWY., SANTA MARGARITA
Permit No DRC2019-00086
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 2.96 acre-feet/year** of combined indoor, greenhouse and outdoor cultivation water use, we do hereby take exception to the demand 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 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 **STATED 5,000 sq-ft** (indoor canopy totals):

   5,000 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 312 plants

   312 (plants) x 3 gal/day water = 936 gal/day water

   936 (gal/day) ÷ 325,851 (gal) = 0.0028 acre-feet/day

   ACTUAL INDOOR DEMAND: 0.0028 X 365 days = 1.02 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 GREENHOUSE Cannabis Cultivation @
SIDIOFAX CUP
7575 CARISSA HWY., SANTA MARGARITA
Permit No DRC2019-00086
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 2.96 acre-feet/year** of combined indoor, greenhouse and outdoor cultivation water use, we do hereby take exception to the demand 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 22,000 sq-ft (greenhouse canopy totals):

   22,000 sq-ft (Total Area) ÷ 16 sq-ft (per plant area) = 1,375 plants

   1,375 (plants) x 2 gal/day water = 2,750 gal/day water

   2,750 (gal/day) ÷ 325,851 (gal) = 0.0084 acre-feet/day

ACTUAL GREENHOUSE DEMAND: 0.0084 X 365 days = 3.06 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 @
SIDIOFAX CUP
7575 CARISSA HWY., SANTA MARGARITA
Permit No DRC2019-00086
Exceptions to Applicants Environmental Submittals Water Management
Water Demand Analysis and Summary

Sirs:

Based on the applicants **STATED DEMAND TOTAL OF 2.96 acre-feet/year** of combined indoor, greenhouse and outdoor cultivation water use, we do hereby take exception to the demand 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 43,560 sq-ft (outdoor canopy totals):

   430,560 sq-ft (Total Area) ÷ 100 sq-ft (per plant area) = 435 plants

   435 (plants) x 4 gal/day water = 1,740 gal/day water

   1,740 (gal/day) ÷ 325,851 (gal) = 0.0053 acre-feet/day

ACTUAL OUTDOOR DEMAND: 0.0053 X 180 days = 0.95 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

Negative Declaration & Notice Of Determination

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

ENVIRONMENTAL DETERMINATION NO. ED Number 20-134 **DATE:** August 17, 2020

PROJECT/ENTITLEMENT: Sidifoax, Inc. Conditional Use Permit;DRC2019-00086

APPLICANT NAME: Sidifoax, Inc.
Email: jhopweiler@yahoo.com
ADDRESS: 7575 Carissa Highway, Santa Margarita, CA 93453
CONTACT PERSON: Lauren Mendelsohn – Omar Figueroa **Telephone:** 707-829-0215

PROPOSED USES/INTENT: A request from Sidifoax, Inc. for a Conditional Use Permit (CUP) to authorize the multi-phased development of up to one acre of outdoor cannabis cultivation canopy, up to 22,000 square feet of indoor mixed-light cannabis cultivation in greenhouses, up to 600 square feet of indoor commercial nursery, and up to 600 square feet of non-volatile manufacturing. Ancillary processing activities would include curing, drying, trimming and packaging. Project development would result in 8.4 acres of site disturbance on one (1) 110 acre parcel and would include the construction of a 7,150 square foot microbusiness building to house the processing, storage, nursery, manufacturing and transport activities, three (3) 10,080 square foot greenhouses, installation of four (4) 10,000 gallon water storage tanks for irrigation use fire suppression and a 100 square foot water pump house. The project would employ up to six (6) people and would operate seven days per week, between the hours of 8:00 AM and 5:00 PM. Operations may take place up to 24 hours per day during harvest seasons. A modification from the parking standards set forth in Section 22.18.050.C.1 of the County's LUO is requested to reduce the required number of parking spaces from 69 to 14 spaces.

LOCATION: The project site is located at 7575 Carissa Highway, approximately 37 miles east of the community of Santa Margarita in the Carrizo Planning Area of the North County Planning Area.

LEAD AGENCY: **County of San Luis Obispo**
Dept of Planning & Building
976 Osos Street, Rm. 200
San Luis Obispo, CA 93408-2040
Website: http://www.sloplanning.org

STATE CLEARINGHOUSE REVIEW: **YES** ☒ **NO** ☐

OTHER POTENTIAL PERMITTING AGENCIES: California Department of Fish and Wildlife
California Department of Food and Agriculture California Department of Forestry (Calfire)
Regional Water Quality Control Board Caltrans

ADDITIONAL INFORMATION: Additional information pertaining to this Environmental Determination may be obtained by contacting the above Lead Agency address or (805)781-5600.
COUNTY "REQUEST FOR REVIEW" PERIOD ENDS AT ..... 4:30 p.m. (2 wks from above DATE)

30-DAY PUBLIC REVIEW PERIOD begins at the time of public notification

Notice of Determination

State Clearinghouse No. _____

This is to advise that the San Luis Obispo County Planning Commission as ☒ *Lead Agency* ☐ *Responsible Agency* approved/denied the above described project on _____, and has made the following determinations regarding the above described project:

The project will not have a significant effect on the environment. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA. Mitigation measures and monitoring were made a condition of approval of the project. A Statement of Overriding Considerations was not adopted for this project. Findings were made pursuant to the provisions of CEQA.

This is to certify that the Negative Declaration with comments and responses and record of project approval is available to the General Public at the 'Lead Agency' address above.

Signature	Project Manager Name	Date	Public Agency
	(for)Xzandrea Fowler, Environmental Coordinator		County of San Luis Obispo

Table 9 – Project Water Demand

Use	Rate	Gross Demand (gallons/year)	Gross Demand (AFY[1])
Outdoor Cultivation	43,560 sf canopy x 0.03 gal/sf/day x 180 days	235,224	0.72
Indoor Cultivation	22,000 sf canopy x 0.1 gal/sf/day x 270 days	594,000	1.82
Nursery: Indoor application rate	5,000 sf plant area x 0.1 gal/sf/day x 270 days	135,000	0.41
		Acre-Feet Per Year	**2.96**

Source: Wallace Group 2019
Notes:
1. Acre Feet per Year

Water on-site is supplied by an existing agricultural well producing 50 gallons per minute, which produces enough water to meet the project's water demand (Wallace Group 2019). While the project would use groundwater, the low demand is not expected to substantially decrease groundwater supplies or adversely impact surrounding wells. Further, the project would not result in the addition of impervious surfaces that would interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Impacts to water supply would be less than significant.

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 (2.96 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 thus ensuring that 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?