Kirk Consulting

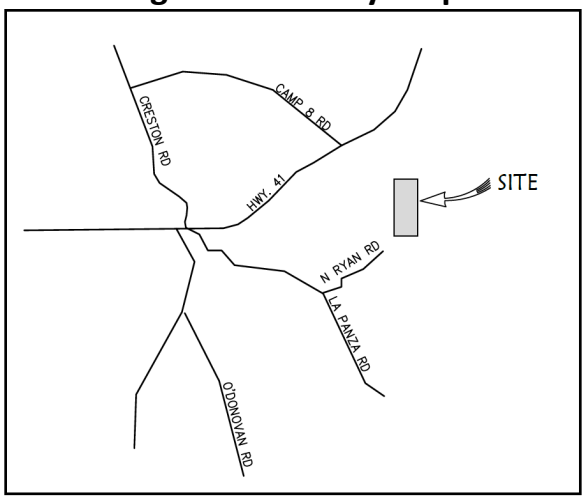
TYLER MITCHELL
SUPPLEMENTAL DEVELOPMENT STATEMENT
CANNABIS MINOR USE PERMIT
4150 N. RYAN ROAD, CRESTON, CA 93432
APN (042-211-014)
PROJECT DESCRIPTION *(October 2020)*

Parcel Size:	78.48 Acres
APN:	042-211-014
Address:	4150 North Ryan Road, Creston, CA 93432
Land Use Designation:	Agriculture
Williamson Act:	No
Water:	On-Site Well
Existing Uses:	Residence, Ag Accessory Structure
Access:	North Ryan Road

General Description

The project site is an approximately 78.48-acre parcel located at 4150 North Ryan Road in Creston (APN 042-211-014), approximately 2.23 miles northeast of the Creston Village Reserve Line. The property is in the Agriculture land use category and is located in the North County El Pomar-Estrella Sub Planning Area. The project site is within the Paso Robles Groundwater Basin and is not enrolled in Williamson Act contract.

Figure 1: Vicinity Map



Project Description – DRC2020-00115

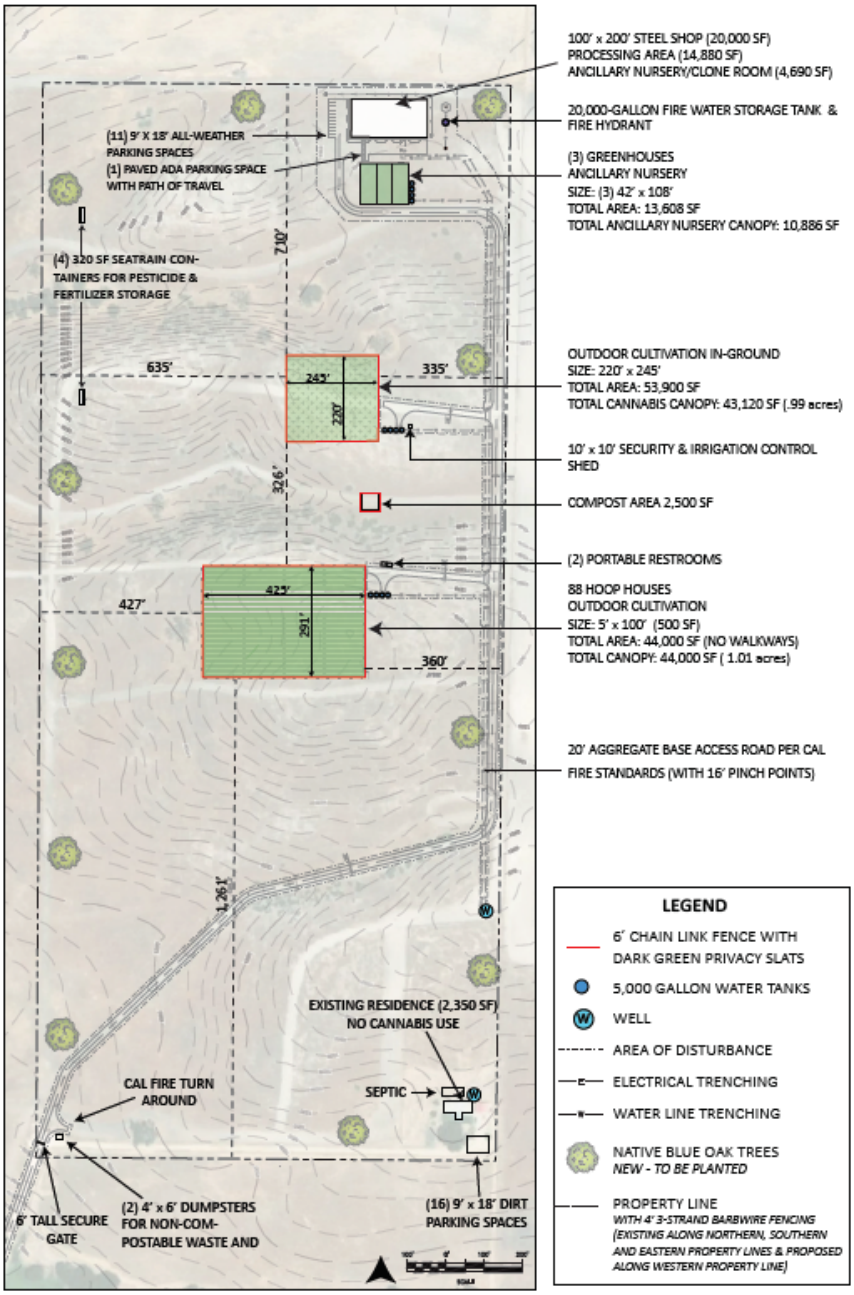
A request by Engrained LLC for a Minor Use Permit to establish up to 2 acres of outdoor (hoop house and in ground) cannabis cultivation, 10,886 sq. ft. of indoor ancillary nursery within three greenhouses, 4,690 sq. ft. of indoor ancillary nursery for cloning and 14,880 sq. ft. of processing within a 20,000 sq. ft. metal building, 1,280 sq. ft. of pesticide and fertilizer storage within four seatrain containers, 2,500 sq. ft. of compost area, a 100 sq. ft. tuff shed for security and irrigation control, and a request for ancillary transport (Distribution – Transport Only). Portable restrooms, water tanks for fire water and irrigation water storage, a non-compostable waste storage and a recycling dumpster are also proposed to support the cannabis operations. The project will include onsite and offsite road improvements. The existing onsite dirt road will be upgraded to a 20' wide all-weather road with 16' wide finger roads to per Cal Fire recommendations. North Ryan Road (offsite) will be upgraded to a 20' wide all-weather road per Cal Fire recommendations. The project will result in approximately 404,529 sq. ft. of onsite disturbance and 66,627 sq. ft. of offsite disturbance, for a total disturbance of 471,156 sq. ft. (10.82 acres). The project includes a modification from the parking standards set forth in Land Use Ordinance (LUO) Section 22.18 to reduce the required spaces from 52 to 28. The project also includes a modification from the fencing standards set forth in Land Use Ordinance (LUO) Section 22.10.080 to allow the proposed greenhouse walls and new barn-like structure for ancillary processing and ancillary cloning nursery to supplement fencing. The project is proposed to be implemented in two phases:

Phase I	Phase II

• Outdoor cultivation in hoop houses and in ground
• Perimeter fencing around cultivation areas and project site
• (1) Shed for security and irrigation control
• (4) Seatrain containers for pesticide and fertilizer storage
• Water storage tanks, portable restrooms, waste and recycling dumpsters, and compost area
• Onsite road improvements to meet Cal Fire standards
• Ancillary Transport
	• Construction of nursery greenhouses
	• Construction of 20,000 sq. ft. building
	  ○ Ancillary nursery cloning
	  ○ Ancillary Processing (drying/trimming)
	  ○ 20,000 gallons Fire water storage tank
	• Onsite and offsite road improvements to meet Cal Fire standards

The proposed project has been designed in compliance with the County's Land Use Ordinance, Chapter 22.40 – Cannabis Activities as approved by the Board of Supervisors on November 27, 2017 and as amended and approved on June 6th, 2019 (Phase II Cannabis Ordinance Amendments).

Figure 2: Overall Site Plan



The project site is approximately 78 acres in size and consists of one legal parcel. The site is located and accessed from North Ryan Road. Land uses in surrounding areas can generally be classified as agriculture and low density residential, with interspersed parcels that are either undeveloped or used for livestock grazing or other agricultural uses. The area's topography is generally level with varying topography along the northern edge of the parcel. The average slope of the site is 10%.

Existing uses on the site include a single-family residence (Permit C7645). The applicant also owns the adjacent parcel to the west totaling 72.63 acres (APN 042-211-013). A portion of the access road on the property was previously graded (Permit C2449).

Table 1: Project Summary

Cannabis Activity	Proposed Facility	Phase	Gross SF	Gross Acres	Canopy SF	Canopy Acres
Outdoor Cultivation	(88) 5' x 100' Hoop Houses	I	44,000	1.01	44,000	1.01
Outdoor Cultivation	(1) 220' x 245' Area – Plants in Ground	I	53,900	1.24	43,120	0.99
		TOTAL Outdoor Cultivation	**97,900**	**2.25**	**87,120**	**2.00**
Indoor Ancillary Nursery	(3) 42' x 108' Greenhouses	II	13,608	0.31	10,886	0.25
Indoor Ancillary Cloning Nursery	(1) 100' x 200' Metal Building	II	4,690	0.11	4,690	0.11
Processing		II	14,880	0.34	n/a	n/a
Restroom, Break Room, Security Room		II	430	0.00	n/a	n/a
		TOTAL Indoor Ancillary Nursery	**18,298**	**0.42**	**15,576**	**0.36**
Pesticide / Fertilizer Storage	(4) 8' x 40' Seatrain Containers	I	1,280	0.03	n/a	n/a
Compost	(1) 50' x 50' Fenced Area	I	2,500	0.06	n/a	n/a
Irrigation / Security Control	(1) 10' x 10' Tuff Shed	I	100	0.00	n/a	n/a
Portable Restrooms	(2) 4' x 4' Portable Restrooms	I	32	0.00	n/a	n/a
Trash / Recycling Storage	(2) 4' x 6' Dumpsters	I	48	0.00	n/a	n/a
Dirt Parking Area	(16) 9' x 18' Parking Spaces	I	2,592	0.06	n/a	n/a
Water Tanks (Outdoor Cultivation)	(8) 5,000-Gallon Water Tanks	I	454	0.01	n/a	n/a
Water Tanks (Indoor Cultivation	(4) 5,000-Gallon Water Tank	II	227	0.01	n/a	n/a
Water Tank (Fire Water Storage)	(1) 20,000 -Gallon Water Tank	II	573	0.01	n/a	n/a
Gravel Parking Area	(11) 9' x 18' Parking Spaces	II	1,782	0.04	n/a	n/a
Paved ADA Parking Space	(1) 9' x 18' Parking Space	II	162	0.00	n/a	n/a
		TOTAL Area	**140,828**	**3.24**	**102,696**	**2.36**

Note: All activities are proposed.

Cultivation

Cannabis will be cultivated in compliance with the County's Land Use Ordinance. While the ordinance allows for up to 3 acres of outdoor cultivation within the Agriculture land use category on a parcel of this size, the project includes a request for a phased operation to cultivate up to 2 acres of outdoor cannabis with ancillary nursery.

Outdoor cultivation will occur in Phase I and will be located in two separate areas. One outdoor cultivation area will consist of (88) 5' x 100' hoop houses for a total area of 44,000 sq. ft. and 44,000 sq. ft. of canopy (1.01 acres). A single 5' wide raised bed will run down the center of each hoop and there will be no walkways. The second outdoor cultivation area will be within a 245' x 220' area (53,900 sq. ft.) for a total canopy of 43,120 sq. ft. (.99 acres). Plants will be trained along a trellis system, which consists of netting and support posts (t-posts or lumber) to ensure the allowed canopy limits are maintained.

The total outdoor cultivation area will be approximately 2.25 acres with a total cannabis cultivation canopy of 2 acres. The in-ground outdoor cultivation area will be harvested once per year in October, and the hoop house outdoor cultivation area will be harvested three times per year, in June, August, and October.

As a part of Phase II, (3) 42' x 108' greenhouses (13,608 sq. ft.) will be constructed to support the proposed ancillary nursery plants, a total canopy of 10,886 sq. ft. Plants grown in the nursery will be kept in their vegetative life cycle, using mostly sun and supplemental lighting to ensure they do not go into their flowering stage. These plants are maintained the same as any other cannabis plant except they do not receive any fertilizers or additional nutrients that promote the onset of flowers. These plants will occasionally be pruned, and the branches cut during the pruning process will be saved and transferred over to the cloning room. After a harvest occurs, these plants will be transferred to the cultivation areas where they will complete their life cycle and mature into their flowering stage.

Additional ancillary nursery space will be located within a 4,690 sq. ft. room within a new 20,000 sq. ft. barn-like metal structure. The room will be used specifically for ancillary nursery cloning. The cloning room uses pruned branches from the vegetative nursery to grow new plants. The branches are placed into individual rooting cubes and placed into rooting trays, approximating 50 cuttings per tray.

These trays are placed under fluorescent lighting for approximately 2 weeks until the roots protrude through the bottom of the rooting cubes. The plants are then transplanted into larger pots and transferred to the vegetative nursery until they are ready for their transition and planting within one of the cultivation areas onsite.

Total ancillary nursery area onsite will be approximately 18,298 sq. ft., with a total canopy of 15,576. The nursery area is equal to 18.7% of the total outdoor cultivation area and 17.9% of the total outdoor cultivation canopy (less than the maximum allowable 25% of the total cultivation area). No offsite sale of nursery plants is proposed as part of this Minor Use Permit.

Processing and Export of Product

As a part of Phase II, a new 20,000 sq. ft. barn-like metal structure will be constructed to support 14,880 sq. ft. of ancillary processing use. The new structure will be located adjacent to the proposed greenhouses onsite.

Product grown onsite will be dried, cured, and trimmed entirely within the building. Once dried and trimmed, product will be packaged into totes and transported offsite to a licensed facility for further processing, packaging, and distribution. The applicant will obtain a Distribution – Transport Only license to transport product grown onsite to an offsite, State licensed facility. There will be no manufacturing onsite.

Grading Estimate

The project will result in approximately 10,610 CY of Cut / 8,778 CY of Fill for a total site disturbance of 471,156 sq. ft. (404,529 sq. ft. onsite disturbance and 66,627 sq. ft. of offsite disturbance).

As a part of Phase I, all weather road basing will be applied to the existing 16' – 28' dirt road, to ensure a minimum 16' wide all-weather road leads to the cultivation areas. Phase II will include additional grading for a new road to the new barn-like structure (processing and ancillary nursery cloning), and the new greenhouses for ancillary nursery. Grading will also be completed to make improvements to the existing primary access road (North Ryan Road) to meet Cal Fire standards. Refer to the preliminary grading, drainage and erosion control plan prepared by Roberts Engineering, Inc. attached.

Access

The parcel is accessed from a 60' wide public easement road that varies in size, approximately 0.5 miles north of North Ryan Road, and a County maintained road (varying in width from 20 -30 feet) which extends to parcels South and West of the site. The existing dirt road onsite, varying from 16'-28' in width, will have all weather basing added to it in Phase I, and be improved to a 20' all-weather road with 16' finger roads leading to the outdoor cultivation areas in Phase II. The access road, North Ryan Road, will be improved as a part of Phase II of the project to meet Cal Fire standards relative to the proposed new 20,000 sq. ft. metal barn-like structure. Road improvements will include two engineered culvert crossings along North Ryan Road.

Site Operations Plan

Security

The outdoor cultivation areas and compost area will be contained within a secure six-foot chain link fence with dark green privacy slats. The project site has existing four-foot three-strand barb wire fencing along the northern, southern, and eastern property line, and is proposed along the western property line. The new barn-like metal structure for ancillary processing and cloning and the new greenhouses for ancillary nursery will have secure commercial grade locks on all access doors and limited access. No outdoor lighting is proposed. See the attached confidential security plan for more details and Sheet 11 of the Plan Set for the confidential security site plan.

The proposed security plan includes the placement of several cameras at key locations throughout the property to ensure that unauthorized access does not occur. A 10' x 10' tuff shed for security and irrigation control will be constructed in-between the outdoor cultivation sites as a part of Phase I. A security room will be constructed within the 20,000 sq. ft. metal barn-like structure as part of Phase II. Refer to Sheet 10 of the Plan Set for security and irrigation control shed details.

The site will operate in full compliance with State Licensing requirements for track and trace and local Sheriff Department requirements.

Odor Management

The proposed project exceeds all required setbacks from all property lines. Odor from the cultivation areas will be naturally mitigated by these setback distances in

compliance with Title 22.40.050.D.8-Nuisance Odors. Odor from the cultivation areas are further mitigated by the distance to the nearest offsite residence being over 2,163 feet away to the south. The proposed barn-like metal structure will be equipped with odor mitigation technology in the form of carbon scrubbers. The ancillary nursery greenhouses will not produce any odor as nursery plants do not flower.

Land uses in surrounding areas can generally be classified as agriculture and low density residential, with interspersed parcels that are either undeveloped or used for livestock grazing or other agricultural uses. In the event a verified odor nuisance complaint is received during operations, the applicant will coordinate with the County to implement additional odor management controls such as neutralizing additives along the fence line to further eliminate any offsite nuisance odor.

Signage
No exterior signage is proposed.

Parking
The project site will provide (16) 9' x 18' dirt parking spaces to support operations under Phase I. An additional (11) 9' x 18' all-weather parking spaces and one paved ADA parking space adjacent to the greenhouse and metal barn-like structure will be installed as a part of Phase II. Refer to Sheet 1 of the Plan Set for the location of the proposed vehicle spaces. A parking modification is requested below (Page 18-19).

Staffing/Employee Safety
The proposed operations are agriculture in nature and will be conducted typical of other agricultural operations in the immediate and surrounding areas.

The project will employ five full time staff operating between the hours of 7:00 am to 4:00 pm, six days a week. During harvest in June, August, and October, an additional 13 seasonal employees will be onsite (for a total of 18) conducting work during the same hours of operation. During Phase I, harvest times will be one weeklong, where cannabis will be cut and transferred to an offsite processing facility. During Phase II, these harvest times will be approximately two weeks long. Cannabis will be cut and brought into the 20,000 sq. ft. barn-like metal structure

within the processing area, where it will be dried, cured, trimmed, packaged and transported offsite for further preparation and distribution/sale.

Two portable restrooms will be provided for employees. An additional ADA restroom will be constructed within the new barn-like metal structure as a part of Phase II.

Standard agricultural safety and training will occur for all staff as well as additional security training to ensure full compliance with State standards for cannabis track and trace.

Traffic

A trip generation analysis was conducted by Orosz Engineering Group Inc. (revised June 2020). The project is anticipated to generate 11 average trips per day, with 1 PM peak hour trips on a typical weekday.

Outside of employees travelling to and from the site, product transport is anticipated after each harvest, consisting of one passenger van or utility vehicle accessing the site over the course of one week to transport the product to a State licensed facility for further trimming, packaging and distribution. There will be an additional 4 commercial deliveries per year to supply the proposed operation with soil, nutrients, and farm supplies, as needed.

At traffic levels of 1 peak hour trip, the project would not noticeably impact the existing or future road system operation and no significant impacts are anticipated. Refer to the following trip generation summary shown in Table 3 below:

Table 3: Trip Generation Rate Summary

Proposed	Size		PHT Rates		PHT (Trips)
Outdoor Cultivation 53,900 SF	1.24	AC	0	PHT/AC	0.0
Hoop Houses 44,000 SF	1.01	AC	0	PHT/AC	0.0
Greenhouse – Ancillary Nursery Area	13.608	KSF	0.03	PHT/KSF	0.4
Drying/Curing/Processing	14.88	KSF	Seasonal Traffic		0.0
Greenhouse – Ancillary Cloning Nursery Area	4.69	KSF	0.03	PHT/KSF	0.1
Storage Areas	1.28	KSF	0	PHT/KSF	0.0
				Total Proposed PHT	**0.5**

Proposed	Size		ADT Rates		ADT (Trips)
Outdoor Cultivation 53,900 SF	1.24	AC	2	ADT/AC	2.5
Hoop Houses 44,000 SF	1.01	AC	2	ADT/AC	2.0
Greenhouse – Ancillary Nursery Area	13.608	KSF	0.27	ADT/KSF	3.7
Drying/Curing/Processing	14.88	KSF	Seasonal Traffic		0.0
Greenhouse – Ancillary Cloning Nursery Area	4.69	KSF	0.27	ADT/KSF	1.3
Storage Areas	1.28	KSF	1	ADT/KSF	1.3
				Total Proposed ADT	**10.8**

Neighborhood Compatibility

The proposed cannabis operation will be conducted consistent with agricultural operations in immediate and surrounding areas. The project site (78.48-acres) is within the Agriculture land use category and exceeds the minimum site area requirement of 25 acres to allow up to three acres of outdoor cannabis cultivation, ancillary nursery, and ancillary processing operations.

All proposed cannabis cultivation activities exceed the setback requirements and will be contained within a secured and fenced area to screen the operation from offsite view. The new 20,000 sq. ft. building will be constructed similar to a barn-like structure to blend with the surrounding agricultural character of the immediate vicinity.

Odor from the outdoor cultivation areas will be natural mitigated by the 300'+ setbacks and air dispersal. The distance to the nearest residence is approximately 2,163 feet away to the south, the next closest off-site residence is 2,193 feet to the south. The ancillary nursery greenhouses will not produce any odors as nursery plants do not flower. The new metal building, used for additional ancillary nursery space (cloning) and ancillary processing, will be equipped with odor mitigation technology in the form of carbon scrubbers.

The project is anticipated to generate a total of 11 trips per day (ADT) with 1 PM peak hour trip. Traffic for the project will be consistent with other agricultural operations in the area and based on the amount of peak hour traffic trips associated with the project site, no significant impacts are anticipated on existing or future traffic conditions.

The visual aesthetics of the proposed project will be consistent with other agricultural operations in the County including the use of hoop houses for crop protection. All outdoor cannabis activities are proposed near the center of the site with the nearest offsite residence located more than 2,160 feet away to the south. The undulating topography will act to naturally screen the cultivation areas from near off-site views. The northern cultivation area may be visible from very distant off-site views; however, it will not be discernable based on the sheer distance to off-site residential uses to the north. The closest offsite residence to the direct north is located 4,000 feet away, residences to the north west are over 3,000 feet away. The outdoor cultivation areas will be further screened by project fencing and landscaping including new oak trees to be planted along the property line.

The project elements are consistent, and in character with, surrounding uses. Hoop houses are utilized for agricultural operations in close proximity to the property, including at the corner of La Panza and Ryan Road and on an adjacent property. Additionally, the agrarian character of the processing/nursery metal building is similar to buildings throughout Creston, as well as buildings on the property directly north and south of the site. Refer to the attached Visual Character Exhibit for more details.

The proposed operation will not result in a substantial change in visual character of the surrounding agricultural area. The cannabis project footprint is less than 11.8 percent of the site and the remainder of the site will remain in grazing and dry-farm uses or limited irrigated uses as allowed under an approved agricultural water off-set (CON2019-00019).

The project does not propose the use of outdoor lighting and all security cameras installed at the site will include infrared technology (no lights). The greenhouses will be equipped with blackout curtains. Based on these additional measures, it is not anticipated the project will result in any offsite glare or result in illumination or nighttime light pollution.

No neighborhood compatibility issues are anticipated.

Waste Management Plan

Outdoor cultivation will not produce any wastewater as all water is used within the planting environment. All green waste consisting of dead and/or stripped of flower

plants and soil will be composted onsite. Any other trash or recycling will be placed into one of the two 4' x 6' dumpsters located at the front of the property. The trash and recycling dumpsters will be hauled weekly using San Miguel Roll-Off Co Inc.

Two portable restrooms will be located adjacent to the outdoor cultivation areas and will be serviced twice per month. An additional ADA-complaint restroom will be included in the new barn-like structure as a part of Phase II of the project.

Pesticide and Fertilizer Usage

The applicant will obtain an Operator Identification Number for application of pesticides and fertilizer sat the site and comply with all application, reporting, and use requirements according to the County of San Luis Obispo Department of Agriculture. Products used onsite will be stored on shelving within secondary containment inside of four 320 sq. ft. seatrain containers. The following pesticides and fertilizers will be used:

List of Pesticides and Fertilizers

Pesticides and Fungicides	Fertilizers and Amendments
• Monterey BT • Flying Skull / nuke em • Green Cleaner • Vital Earth / Grandevo • Venerate • SaferGro / mildew cure • Serenade garden • Regalia • Green cure	• Age Old Organics / grow • Age Old Organics / bloom • Vital Earth / grow • Vital Earth / bloom • Vital Earth / fish powder • Vital Earth / flower powder • Vital Earth / mega worm castings • Vital Earth / bat guano • Vital Earth / high phos sea bird guano • Sea Pal / fish emulsion • Stutzman / chicken manure • Roots Organics / nitrogen bat guano • Roots Organics / super phos bat guano • Sparetime / molasses • Sparetime / mocha bat guano • Baseline / humic acid • PCG / seabird guano • Earthjuice / bloom • The Guano Company / Budswel • Mission Fertilizer / CrayZ Swell

Hazardous Materials Plan/Employee Training and Safety

Employees will be trained on the proper administration of pesticides/fertilizers and spill clean-up practices. A monthly safety meeting will be held to review the most recent safety practices and ensure all employees are educated on inspection and reporting procedures should an event occur. Two 6' x 4' dumpsters with secure, tamperproof lids will be located near the front of the property and will be hauled off weekly by San Miguel Roll Off Co Inc.

- Inspection and Maintenance
    - Inspect equipment used onsite on regular basis. Look for any potential signs of fluid leakage.
    - Keep ample supplies of spill control and cleanup materials onsite, near storage, unloading, and maintenance areas.
- Reporting
    - Report significant spills to local agencies, such as the Fire Department; they can assist in the cleanup.
    - Notification should first be made by telephone and followed up with a written report.

Setbacks

The proposed cannabis operations will meet the required setbacks of the County's Cannabis Ordinance. Outdoor cannabis cultivation is required to be setback as set forth in Land Use Ordinance Section 22.40.050 (Cannabis Cultivation), and indoor ancillary nursery and ancillary processing is required to be setback as set forth in Land Use Ordinance Section 22.30.310 (Nursery Specialties). See Table 4 below for proposed cannabis use setbacks and Land Use Ordinance setback requirements.

Table 4: Land Use Ordinance Standards

Land Use Ordinance Section / Use	Front (south)	Side (west)	Side (east)	Rear (north)
22.40.050 - Cannabis Cultivation	300'	300'	300'	300'
In-Ground Outdoor Cultivation	1,878'	635'	335'	710'
Hoop House Outdoor Cultivation	1,261'	427'	360'	1,256'
22.30.310 - Nursery Specialties	50'	30'	30'	30'
Ancillary Greenhouse Nursery	2,508.8'	832.3'	265.2'	204.8'
Ancillary Cloning Nursery (Barn-like Structure)	2,677.6'	807.6'	216.8'	39'
Ancillary Processing (Barn-like Structure)	2,677.6'	807.6'	216.8'	39'

Indoor ancillary nursery and indoor ancillary processing activities are also required to be setback 100 feet from any existing offsite residence, swimming pool, patio, or other living area of separate ownership. The proposed ancillary nurseries and ancillary processing area are setback over 100 feet from an existing offsite residence as shown on Sheet 2 of the Plan Set.

The nearest sensitive receptors (schools, parks, libraries, licensed recover facilities, et. al) are located outside the 1,000-foot setback required by Land Use Ordinance Section 22.D.1. The distance to the nearest sensitive receptor, Creston Elementary School, is located approximately 2.36 miles southwest of the project site.

Air Quality
The project is located on an existing agricultural site. All ground disturbing activities during Phase I and II will employ dust control methods. There are no predicted air quality impacts.

Screening and Fencing
The project site has existing four-foot three-strand barbwire fencing around the northern, eastern, and southern property lines and is proposed along the western property line. New six-foot chain-link fencing with dark green privacy slats will be installed around both outdoor cultivation areas. A new six-foot secure entrance gate will be installed at the site entrance, per Sheriff guidelines. A fencing modification is requested to not require fencing around the proposed greenhouses or the new 20,000 sq. ft. building. The basis for the fencing modification is further described on Pages 19 and 20.

Water Management Plan
The property is in the Salinas/Estrella Water Planning Area of the Paso Robles Groundwater Basin. The project site is served by two existing groundwater wells. One well will continue to serve the residence and support cannabis operations, while the other well will only serve the cannabis operation.

A total of (12) new 5,000-gallon water tanks will be installed near each outdoor cultivation area and the ancillary nursery greenhouses. One new 20,000-gallon water tank will be installed next to the 20,000 sq. ft. structure for fire water and storage. No import of water is necessary or will occur in association with the proposed cannabis cultivation operations.

A water demand analysis was prepared by Cleath-Harris Geologists (revised June 2020), which estimated a total water demand of 4.1 AFY or 3,660 gallons per day for irrigation and domestic (employee) water use. Refer to the annual water demand estimate below:

Table 5: Estimated Water Use

Cultivation Type	Canopy Area	Applied Water	
	(square feet)	(feet/year)	(acre-feet per year)
Outdoor flower	43,120	1.11	1.10
Hoop house flower	44,000	1.91	1.93
Greenhouse ancillary nursery	10,886	3.30	0.82
Ancillary cloning nursery	4,690	1.32	0.14
TOTAL			3.99

Use	Rate	Gross Demand (gallons/year)	Gross Demand (AFY)
Domestic Water Demand	5 employees x 15 gal/capita/day x312 days/year	23,400	0.07

Water Offset

In addition to the above water management plan, the applicant will submit a water conservation plan as required by the County for cannabis related activities within the PRGWB. This plan will include a package of measures that, when implemented, will achieve a 1:1 water demand offset required by LUO Sections 22.40.050 D.5, 22.40.060 D.5 and 22.94.025 F and Building Ordinance Section 19.07.042 (4). Lastly, the applicant will provide to the Department of Planning and Building for review quarterly, evidence that the water efficiency improvements associated with the approved water conservation program remain in full effect and are continuing to achieve the required water demand offset associated with the approved project.

Energy Use

An Energy Demand Analysis completed by In Balance Green Consulting (June 2020) determined that the proposed energy use for the cannabis operations is estimated to be 194,753 kWh/year. The project will use 72% less energy than the baseline energy use of a generic commercial building (705,033 kWh/year). See the attached Energy Demand Analysis for more details.

To address the project's greenhouse gas emissions and energy use, the applicant is proposing to install roof top solar and battery storage on the metal building in

Phase II. Any excess energy demand requiring mitigation will be reduced by permanently sourcing energy from a clean energy source by enrolling PG&E's Solar Choice program or Regional Renewable Choice program or other comparable public or private program.

The project will off-set its greenhouse gas emissions such that the project will qualify as a 'net-zero' project. Emission reduction strategies will be further outlined in the Final GHG Reduction Program. GHG reduction strategies may include, but will not be limited to, the following measures:

- Construction of buildings that achieve energy and water efficiencies beyond CCR, Title 24 requirements;
- Implementation of green building practices and/or cool roofs;
- Installation of energy-efficient equipment and appliances exceeding California Green Building Code standards;
- Installation of outdoor water conservation and recycling features, such as smart irrigation controllers and reclaimed water usage;
- Installation of low-flow bathroom and kitchen fixtures and fittings;
- Installation of light emitting diode (LED) lights;
- Implementation of waste reduction programs that may include waste minimization, waste diversion, composting, and material reuse/recycling;
- Promotion of alternative fuel vehicles, including through the installation of electric vehicle charging infrastructure;
- Implementation of carbon sequestration measures, such as tree planting;
- Purchase carbon offsets to reduce GHG emissions below threshold levels.

Issues Requiring Special Consideration

Cultural Resources

A Phase I Archaeological Surface Survey was prepared by Heritage Discoveries, Inc. for all areas proposed for cannabis use onsite. The report produced negative results for the presence of cultural resources. See the report attached.

Biological Resources

A Biological Resources Assessment Report (BRA) was completed by Padre, Inc. in July 2019 and an amendment memorandum to the BRA was completed in June 2020 due to a reduction in project scope. A Kit Fox Habitat Evaluation was completed by Padre, Inc. in September 2019 and revised in June 2020 due to a

reduction in project scope. The proposed project does have the potential to impact special-status wildlife and plant species that could occur at the site (as described in the Report), however, potential impacts to these species are construction-related (i.e. vehicle traffic and mortality or injury, project-related noise to affect nesting bird activity). Section 5.0 of the Report summarizes the mitigation measures to be implemented to avoid or reduce impacts to special-status wildlife and plant species.

San Joaquin Kit Fox (SJKF)

The project site is within the County's 1:1 mitigation area for SJKF, and per County guidelines, mitigation to offset impacts to habitat requires either: establishment of an on- or offsite conservation easement equaling the area of disturbance as well as a non-wasting endowment fund, *or* payment of an in-lieu fee to an approved fund, *or* purchase of credits in an approved conservation bank. The applicant will comply with this requirement as prescribed and offsite compensatory mitigation will be provided at the time of issuance for each building permit (greenhouses and 20,000 sq. ft. building). It is anticipated the project will result in approximately 10.82 acres of impact to potential Kit Fox habitat.

The following measures are recommended by Padre Associates to reduce the project's impacts to less than significant:

1. Work Timing. All work activities shall be completed during daylight hours (between sunrise and sunset) and outside of rain events;
2. Work Limits. The Project impact area shall be clearly marked or delineated with stakes, flagging, tape, or signage prior to work. Areas outside of work limits shall be considered environmentally sensitive and shall not be disturbed;
3. Vehicles and Equipment. All equipment and vehicles shall be checked and maintained daily to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established for vehicle/equipment parking and storage of fuel, lubricants, and solvents. All fueling and maintenance activities shall take place in the staging area;
4. Biological Monitoring. Biological monitoring shall be completed by a qualified biologist for all initial ground disturbance (e.g., grading/excavation activities). For this task, the biologist shall survey/clear undisturbed work areas prior to start of work and then monitor the area while initial grading activities are completed. Any wildlife observed during monitoring shall be allowed to move out of work limits of their own volition or shall be captured and relocated to nearby suitable habitat by the biologist, as necessary and in compliance with state and federal Endangered Species Act regulations.

5. Burrow Assessment. Prior to disturbance of burrows that may support special-status species, such as, American Badger and San Joaquin kit fox, the occupancy shall be determined with non-invasive methods. Motion sensor cameras and/or tracking medium may be deployed to determine the active status of the burrow. If San Joaquin kit fox are identified, the USFWS should be notified immediately and all Project activities halted to determine avoidance measures;
6. Special-Status Plants. If a special-status plant species is observed during biological monitoring, the County and other appropriate agencies will be notified, and measures to avoid and/or minimize impacts will be determined, which could include plant avoidance, seed collection, or transplanting;
7. Nesting Bird Surveys. In the event vegetation removal (i.e., tree trimming/removal activities) are scheduled between February 1 and August 31 (general nesting bird season), nesting bird surveys shall be completed by a qualified biologist within 48 hours prior to start of work. If any active nests are discovered within or adjacent to work limits, an appropriate buffer (i.e., 500 feet for raptors and 250 feet for other birds, or at the discretion of a qualified biologist based on biological or ecological reasons) shall be established to protect the nest until a qualified biologist has determined that the nest is no longer active and/or the young have fledged; and
8. Oak Tree Mitigation. Based on discussions with the client, all disturbance areas can be configured such that they avoid impacting oak trees. If impact to oak trees becomes necessary at any point during the Project, including for right of way improvements, the following measures shall be implemented:

    - No oak tree shall be removed without prior County approval;
    - Trees within 20 feet of grading or trenching shall be protected by placement of protective fencing at least one foot outside the dripline;
    - Trenching and excavation within the tree driplines shall be hand-dug or bored to minimize root disturbance. Any root encountered on inch diameter or greater, shall be hand cut and appropriately treated;
    - Pruning of lower limbs in the construction area shall occur prior to construction activities to minimize damage; and
    - An oak tree replacement plan will be prepared and submitted to the County for approval, and a certified arborist shall be contracted to provide guidance on trimming and/or removal of oak trees in the field.

Parking Modification and Required Findings

The project will require 5 full-time staff with a seasonal increase to 18 employees (13 seasonal employees). The project is designed to accommodate staff with (16) 9’ x 18’ dirt parking spaces, (11) 9’ x 18’ all weather parking spaces and 1 paved ADA parking space to be located adjacent to the 20,000 sq. ft. building.

Due to the limited number of staff required for the proposed operation, parking standards as outlined in Chapter 22.18 – Parking and Loading Standards (Nursery

Specialties and Ag Processing) are not appropriate for the project (1 parking space per 500 sq. ft. of floor area for the indoor ancillary nursery (equivalent use within Section 22.18 is Nursery Specialties) and 1 parking space per 1,000 sq. ft. of floor area for ancillary cannabis processing (equivalent use within Section 22.18 is Ag Processing)). This results in a need for approximately 52 parking spaces (18,298 sq. ft. of indoor nursery area / 500 sq. ft. = 37 parking spaces + 14,880 sq. ft. of processing area / 1,000 sq. ft. = 15 parking spaces).

The following justification is provided to make the required findings to modify the parking standards of Chapter 22.18 – Parking and Loading Standards.

In accordance with Chapter 22.18.020.H, the following three findings support the request to modify the parking standards:

a. The characteristics of the project, which consists of outdoor cannabis cultivation, indoor ancillary nursery area, and ancillary cannabis processing, with seasonal temporary staff, do not necessitate the number of parking spaces, types of design or improvements required by this chapter. All employees, full-time or seasonal, can be accommodated in the dirt area adjacent to the existing residence that will be marked and designated for 16 vehicle parking spaces. An additional 11 gravel parking spaces and one ADA parking space will be constructed adjacent to the proposed metal building.
b. As the operation will include only five full-time employees, with a seasonal increase to 18 during harvest season (June, August, October), the proposed vehicle spaces at project build-out are adequate to accommodate all parking needs of the proposed operation generated by the use.
c. No traffic safety problems will result from the proposed modification of the parking standards as there is existing parking on the site to accommodate the proposed use. The parking area is located away from the public right of way, there is adequate space surrounding the parking area for any turning movement, and at contributing traffic levels of one PM peak hour trip, the project traffic results in less than the smallest number of trips that are reasonably tracked through the road system. The project would not noticeably impact the existing or future road system

operation and no significant impacts would be created with the addition of the project traffic on existing or future traffic conditions.

Fencing Modification Request

A fencing modification is requested from the LUO Section 22.10.080 to **not require** solid and durable fencing around the proposed greenhouse and 20,000 sq. ft. barn-like metal structure as required in LUO Section 22.40.050D.6.f because these structures will be constructed using solid and durable materials, will be able to be locked at all entrances with commercial grade locks, and will not allow visibility of the plant type within the structures, rending the required fencing and screening unnecessary and ineffective.

The proposed greenhouse walls will be constructed of durable corrugated metal siding or polycarbonate siding. Corrugated metal siding improves the structural integrity of the end wall by adding sheer value and improving the strength and longevity of the greenhouse. Polycarbonate siding is a strong, non-transparent, rigid plastic which provides lightweight and durable siding. In addition to the heavy-duty siding, commercial grade secure locks will be installed at all points of entry. These building materials, along with the secure locks, will eliminate visibility of the plants and activities within from both on and offsite, and prohibit unauthorized access within the structures making additional fencing unnecessary and ineffective.

Additional measures to be implemented by the applicant to further render the fencing requirements unnecessary are as follows:

The applicant will live onsite for around the clock presence. A four-foot three-strand barbwire fencing is existing along the northern, eastern, and southern property lines and is proposed along the western property line. A new site entrance gate will be installed in accordance with the Sheriff Department security recommendations. A network of surveillance cameras will be installed to provide complete visual coverage of the cannabis operations area and access points to ensure no unauthorized access occurs. See additional confidential security measures disclosed in the attached Confidential Security Plan.