



BRADLEY CANYON FARMS, LLC  
 SUPPLEMENTAL DEVELOPMENT STATEMENT  
 CANNABIS CONDITIONAL USE PERMIT  
 1255 TIERRA REDONDA ROAD, BRADLEY, CA 93426  
**PROJECT DESCRIPTION (May 2020)**

---

<b>Parcel Size:</b>	99.84 Acres
<b>APN:</b>	080-021-051, 080-021-052
<b>Address:</b>	1255 Tierra Redonda Road, Bradley, CA 93426
<b>Land Use Designation:</b>	Rural Lands
<b>Williamson Act:</b>	No
<b>Water:</b>	On-Site Well
<b>Existing Uses:</b>	Single Family Residence, Ag Barns, Cannabis Operation
<b>Access:</b>	Tierra Redonda Road

The subject property consists of 2 parcels totaling 99.84 acres, located at 1255 Tierra Redonda Road in Bradley, CA (APNs 080-021-051, 080-021-052), approximately 25 miles West of California State Highway 101, in the North County Planning Area and zoned Rural Lands. Existing uses on the site include a single-family residence, two as-built barns for ag storage (2,400 sq. ft. and 1,200 sq. ft.) and cannabis cultivation operations under CCM2016-00361.

**Figure 1: Vicinity Map**



**Proposed Project - DRC2018-00110**

A request by Bradley Canyon Farms, LLC for a Conditional Use Permit to authorize 0.98 acre of outdoor cannabis cultivation, 5,376 sq. ft. of outdoor ancillary nursery canopy in existing hoop house structures and use of one existing as-built barn (2,400 sq. ft.) for ancillary nursery space. The ancillary nursery will total 9,120 sq. ft. (7,776 sq. ft. total canopy), less than 25% of the total flowering canopy. The site

has existing cannabis operations under CCM2016-00361. The proposed project has been designed in compliance with LUO Section 4, Chapter 22.40- Cannabis Activities as approved by the Board of Supervisors on November 27, 2017. Cultivation and supportive/ancillary activities will include growing in hoop houses with ancillary nursery within an existing structure. Product will be shipped off-site for processing and distribution. All nutrients and pesticides will be stored in two seairain containers (320 sq. ft. each). The project site is accessed from Tierra Redonda and existing onsite roads and is located primarily in areas historically graded in association with agricultural-exempt activities for animal keeping. The approximate volume of excavation for installation of eight water tanks (2 CY cut / 2 CY fill), two seairain containers (8 CY cut / 8 CY fill) , fencing (13 CY cut / 13 CY fill) and irrigation lines (26 CY cut / 26 CY fill) is a total of 49 CY cut / 49 CY fill with an estimated area of disturbance of 3,170 square feet. The cultivation operations will not result in any additional ground disturbance as all cannabis plants are grown in above-ground pots. Improvements necessary to bring additional power capacity to the site will be applied for in compliance with building permits necessary to electrify the existing building to be utilized for ancillary nursery. Until additional power is installed/secured with PG&E, a generator will provide temporary power for the project. A 500-gallon diesel tank is located on a level space within the existing cultivation area to provide temporary power as needed for the well and nutrient delivery.

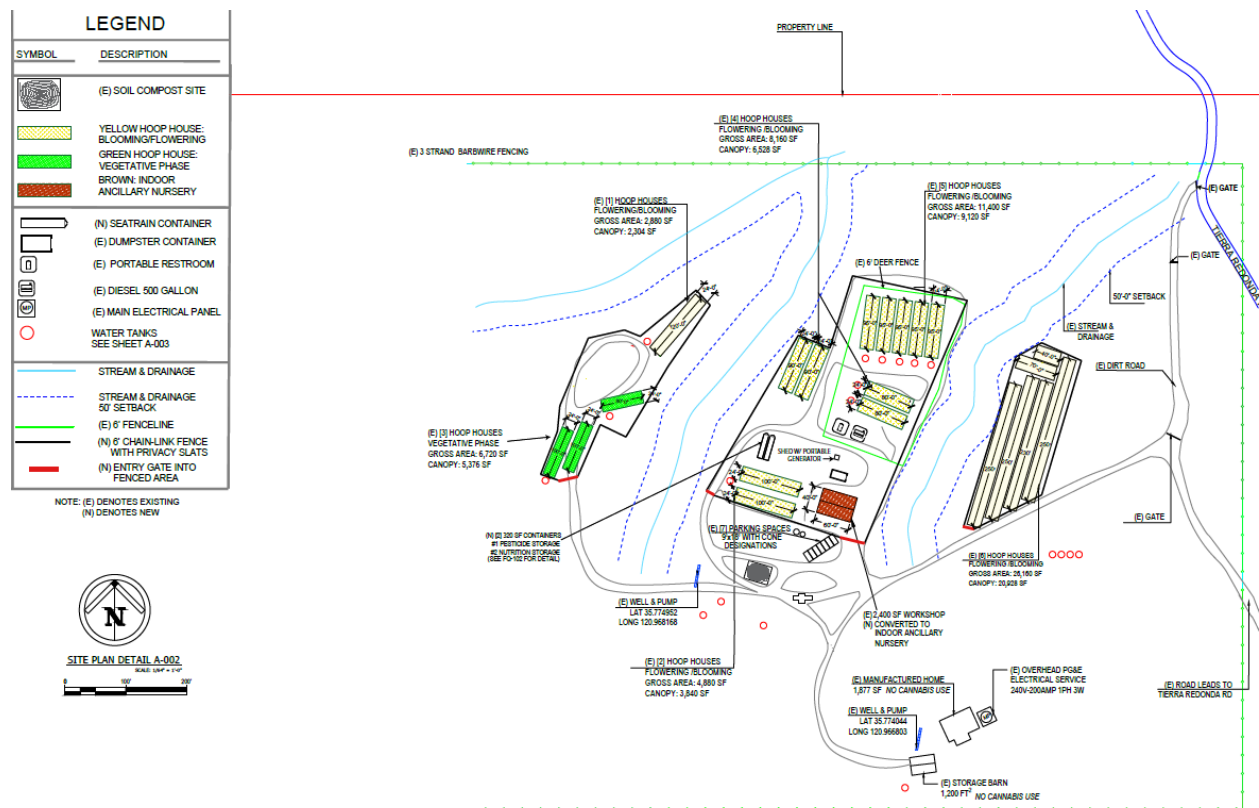
**Table 1: Summary of Project Scope**

Structure Type	Use	Size	Count	Total SF	Walkway SF	Canopy SF	
Hoop House	Outdoor Cultivation: Flowering	40' x 24'	1	960	192	768	
		70' x 24'	1	1,680	336	1,344	
		80' x 24'	2	3,840	768	3,072	
		90' x 24'	2	4,320	864	3,456	
		95' x 24'	5	11,400	2,280	9,120	
		100' x 24'	2	4,800	960	3,840	
		120' x 24'	1	2,880	576	2,304	
		230' x 24'	1	5,520	1,104	4,416	
		250' x 24'	3	18,000	3,600	14,400	
	<b>TOTAL</b>			<b>18</b>	<b>53,400</b>	<b>10,680</b>	<b>42,720</b>
	Outdoor Ancillary Nursery	80' x 24'	1	1,920	384	1,536	
100' x 24'		2	4,800	960	3,840		
<b>TOTAL</b>			<b>3</b>	<b>6,720</b>	<b>1,344</b>	<b>5,376</b>	
AG Barn	Indoor Nursery	40' x 60'	1	2,400	n/a	2,400	
<b>TOTAL Nursery</b>				<b>9,120</b>	<b>1,344</b>	<b>7,776</b>	

*\*All hoop houses and structures are existing.*

The area is sparsely developed with very low densities and larger parcel sizes (40+ acres). The land uses in the surrounding area include agriculture and open space/rural lands. The area's topography is relatively flat where the cultivation operation is located, and it has been designed to minimize any tree impacts. There are three ephemeral drainages that flow through the property. All cultivation operations are located over 50 feet from the drainages at the nearest point and located on areas previously disturbed in association with previous agricultural uses and cannabis operations.

**Figure 2: Site Plan**



## Site Operations Plan

### Ancillary Nursery

Outdoor supportive nursery operations will occur in 3 hoop houses totaling 6,720 sq. ft. (5,376 sq. ft. canopy) and within an existing ag building (to remain a U occupancy) totaling 2,400 sq. ft. for a total nursery area of 9,120 sq. ft. (7,776 sq. ft. canopy). All nursery plants are to support onsite cultivation. No nursery plants will be sold or transported offsite. Nursery plants or seeds will be purchased from a licensed cannabis nursery facility. In addition to purchasing plants or seeds from offsite, "Mother Plants" will be raised on-site solely to provide cuttings and to

preserve the desired genetics of the cannabis plants on-site. Mother plants are kept in their vegetative phase of growth and do not produce odors.

### **Outdoor Cultivation**

Outdoor cultivation will consist of 18 hoop houses ranging in size with plants in above-ground pots totaling under one acre of canopy. The hoop houses will be a maximum height of 12' and will have white polyethylene covering during cultivation months March-late October. During the evening hours, the hoop houses will be covered with a plastic called Panda Film. Panda Film is a 2-sided plastic, inside is black and outside is white. This material is pulled over the hoops anywhere from 5pm – 7pm, depending on the light and time of year. This process allows for a “black out” and simulates nighttime to assist in the process of making the plants flower. The Panda Film is then removed early in the morning (5am – 7am) so the plants may receive natural sunlight. A white, with some transparency plastic poly film is used during the day. This is the standard “berry” plastic poly film used on hoop houses for other farm and agricultural activities.

The outdoor cultivation will yield 2-3 harvests per year (June, August, late October). Once harvested, product will be taken off-site for processing and final distribution. There will be no processing or manufacturing of product on site.

### **Irrigation**

The project site is served by two existing wells that provide the necessary water for the cultivation operation. There is a third well on the site that does not currently serve the existing or proposed cannabis activities. Cannabis activities have been occurring on the site since approval of the CCM. As such, infrastructure for irrigation is currently in place for 7 of the existing hoops. Irrigation lines will be expanded to each of the remaining hoops along the existing and established ag roads to limit disturbance and impacts to trees and vegetation on the property. Trenching will include a 6” x 2’ deep excavation. Irrigation lines will surface to feed the cannabis plants in the above ground pots. Additional water tanks for irrigation storage will be placed on level areas adjacent to the cultivation areas and only minor leveling is anticipated prior to placement of the tanks on the ground. The operation currently utilizes a generator for irrigation to pressurize the pump system to the hoop houses. The system is typically in operation between the hours of 7am-10am.

## Access

The project site is accessed from Tierra Redonda Road, formerly "County Road 22" which is a public highway that provides legal access to several properties and extends beyond the site to intersect with Lynch Canyon Road. See minutes from 1991 Board of Supervisors meeting, representative map, and email from Fred Andrews of Public Works.

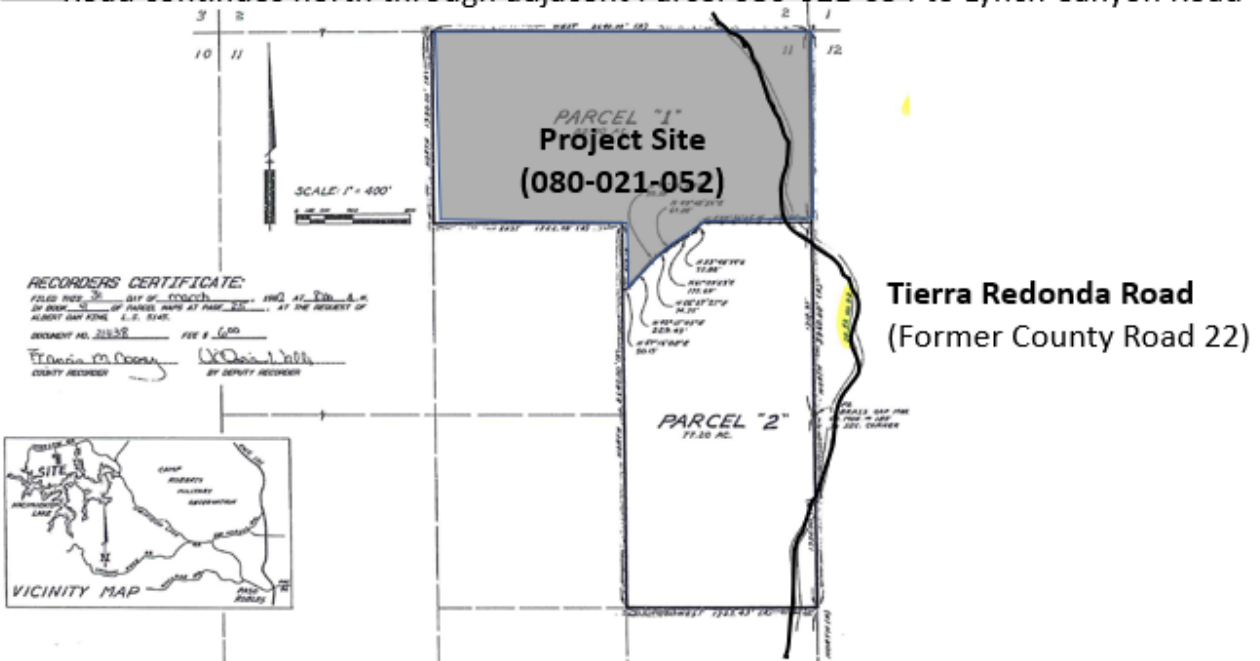
Thereafter, the Hearing Officer tentatively approves this matter, based on Findings A through E, to be effective on December 30, 1991, if no appeal is filed:

15. Hearing to consider proposal by JESSE SPERRY for a Minor Use Permit to name an unnamed road. The new road name is Tierra Redonda Road located off Lynch Canyon Road near Lake Nacimiento and Oak Shores in the Nacimiento Planning Area. County File Number: 232.0008. Date application filed: November 4, 1991.

### MINUTES:

Hearing Officer: Warren Hoag  
Staff: Paulo Hernandez  
Applicant: Not present

—Road continues north through adjacent Parcel 080-021-054 to Lynch Canyon Road



Email correspondence from Fred Andrews, Assoc. Real Property Agent, Public Works: There is no evidence that Co RD # 22 has ever been abandoned. Co RD # 22 was established as a public highway in 1871. It is Not in the County maintained

system. Co RD # 22 had a name change to “Tierra Redonda Rd. Numerous Parcel Maps have been filed and approved based on the access provided by this road. (your clients..PM 41-25, PM 26-43).

### **Security**

The cannabis use will be contained within an existing secure six-foot deer fence around the center of the project site. An existing six-foot three-strand barbwire fence is located along the northern, eastern, and southern perimeter of the property outside the cultivation area. New six-foot chain-link fencing with privacy slats will be installed around each cultivation area (three total) to fully enclose the proposed cannabis use areas onsite. See Sheets A-001, A-002, and S-1 for the location. The proposed security plan includes placement of several cameras equipped with infrared technology (no lights) at key locations throughout the property to ensure that unauthorized access does not occur. Staff security measures ensure that product is not removed from the site. The existing site topography and mature vegetation precludes easy visibility of the project site. Additional security staff will be onsite during harvest times (June, August, late October) for additional surveillance. The site will operate in full compliance with State licensing requirements for track and trace and adhere to all required security protocols. See separate confidential Security Plan (Sheet S-1) attached.

### **Odor Management**

The proposed project meets and/or exceeds all required setbacks. Odor from the cultivation areas is naturally mitigated by these setback distances in compliance with Title 22.40.050.D.8-Nuisance Odors. The distance to the nearest offsite residence is approximately 1,400 feet separated by complex intervening topography and dense vegetation. The proposed nursery operation is not anticipated to create any odor issues, as the plants are immature and do not produce odor.

The surrounding areas are in agricultural production intermixed with very low residential densities. In the event an odor nuisance complaint is raised during operations on the site, 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 seven 9' x 18' vehicle parking spaces to accommodate up to 11 employees for the proposed cultivation operations. The parking area will be within an existing disturbed dirt area delineated with cones. Refer to Sheet A-002 of the plan set for the location. A parking modification is requested below (Page 14).

## **Staffing/Employee Safety**

The proposed operations are agricultural in nature and will be conducted typical of other agricultural operations in the immediate and surrounding areas. Hours of operation will be between 6am and 8pm; all workers who are driving will vacate the property no later than 6pm. This project will employ 4 laborers who live on site, 1 manager and 1 person who commutes. Harvest operations are expected to generate an additional six to eight round trip vehicle trips a day over a one- to two-week period. There is expected to be three harvest operations occurring each year in June, August and late October.

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. In accordance with State licensing requirements the applicant will prepare and submit as part of the business license process a full employee safety and management plan.

## **Neighborhood Compatibility**

The proposed cannabis operation will be conducted consistent with previous agricultural uses of the property and those in the surrounding area. The project site (99.84 acres) is within the Rural Lands land use category and adheres to the maximum requirement of one acre of outdoor cannabis cultivation. The operation currently utilizes a generator for irrigation to pressurize the pump system to the hoop houses. The system is typically in operation between the hours of 7am-10am. Three-phase power is planned for installation in the future which will allow elimination of the temporary generator currently in use. The generator is housed within an existing shed to reduce the temporary offsite noise impacts located north of the existing workshop to be used for indoor nursery. No outdoor lighting will be

utilized. The grower has reached out to adjacent neighbors regarding the existing cultivation and is willing to work with them to understand the concerns that can be adequately addressed in order to increase positive relations.

**Waste Management Plan**

Hoop house 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) are composted onsite within a secured and fenced area for reuse onsite. The soil is kept on site for 1 year and is reused the following year as potting soil. The soil pile is covered, and erosion control measures are deployed during winter months. Once the soil has completed its life cycle, it is hauled offsite to a licensed waste facility. The existing septic on the property is appropriately sized for the current uses on the site and the approval of the land use permit will not result in any changes in use intensity beyond what is already occurring in association with the approved registration on the site. Up to six portable restrooms will be provided. See Sheet A-002 for location.

**Storage and Hazard Response Plan**

The applicant has obtained an Operator Identification Number (40-20-4010884) for application of pesticides and fertilizers at the site and will continue to comply with all application, reporting, and use requirements according to the County of San Luis Obispo Department of Agriculture. Products used onsite are stored in two seatrain containers (320 sq. ft. each) placed on an existing level surface within the fenced cultivation area. Products consist of the following:

PRODUCT	TYPE	ACTIVE INGREDIENT
Azadirect	Liquid	Azadirachtin
Cueva	Liquid	Copper Octanoate
Dipel DF	Powder	Bacillus thuringiensis, subsp. kurstaki
DoubleNickel LC	Liquid	Bacillus amyloliquefaciens strain D747
Kaligreen	Powder	Potassium bicarbonate
M-Pede	Liquid	Potassium salts of fatty acids
Mycotrol ESO	Liquid	Beauveria bassiana Strain GHA
Oxidate 2.0	Liquid	Hydrogen Dioxide/Peroxyacetic Acid
Oxigreen	Liquid	Peroxyacetic Acid/Hydrogen Peroxide
Pest Out	Liquid	Cottonseed, Clove, Garlic Oil
Regalia	liquid	Reynoutria sachalinensis
Trilogy	Liquid	Clarified Hydrophobic Extract of Neem Oil
Xentari	Powder	Bacillus thuringiensis, subsp. aizawai,
PFR 97	Powder	Isaria fumosorosea Apopka Strain 97



The temporary diesel tank (500 gallons) is located on an existing level surface away from any sensitive resources. No other potential hazardous materials will be kept onsite.

### **Setbacks**

Land Use Ordinance section 22.40.050 (D)(3)(b) requires outdoor cannabis cultivation sites to be setback 300 feet from all property lines and public rights of way. The cultivation area is 454 feet from the northern property line, 1,026 feet from the east property line, 914 feet from the west property line, 675 feet from the southern property line, and 387 feet from Tierra Redonda Road. The nearest offsite residence is located approximately 1,400 feet away from the cultivation area. The nearest sensitive receptors (schools, parks, libraries, licensed recover facilities, et.al) are located well outside the 1000-foot setback required by 22.40. D.1. Additionally, the project elements are located outside the setbacks from the drainages onsite.

### **Screening and Fencing**

The site is accessed via Tierra Redonda Road. Existing six-foot deer fencing is located around a portion of the cultivation area and a six-foot three-strand barbwire fence is located around the northern, eastern, and southern perimeter. New six-foot chain-link fencing with privacy slats will be installed around each cultivation area (three total) to fully enclose the proposed cannabis use areas onsite. See Sheets A-001, A-002, and S-1 for the location.

### **Water Management Plan**

The projected water usage is provided for the entire site as defined by the grower's practice of transitioning onsite nursery plants into the cultivation environment. There are 18 cultivating hoop houses proposed, supported by 3 additional nursery hoop houses and indoor space for supportive nursery plants. The summary below represents the actual water use for the entire life cycle of the harvests. The table outlines the water use per growing cycle by week- use is shown in gallons per plant per week, and then is extrapolated to usage per acre based on plant count. The estimated water usage is 0.48 AFY per growing cycle per acre of plants grown, so at maximum (3 cycles per year) the annual estimated water usage for less than 1 acre is 1.44 AFY (for the entire growth cycle, from vegetative to flower- all hoops).

### Annual Estimate Water Usage

PHASE/TIMING	GAL/PLANT/WEEK	USE LEVEL	GAL/WEEK/ACRE
Vegetative Stage	Week 1	0.33	100% 682
	Week 2	0.33	100% 682
	Week 3	1.16	100% 2,399.7
	Week 4	1.16	100% 2,399.7
	Week 5	2	100% 4,138.2
Transition	Week 6	4	100% 8,712.00
	Week 7	6	100% 13,068.00
	Week 8	7.2	100% 15,681.60
Flower	Week 9	7.2	100% 15,681.60
	Week 10	8.4	100% 18,295.20
	Week 11	8.4	100% 18,295.20
	Week 12	8.4	100% 18,295.20
	Week 13	8.4	100% 18,295.20
	Week 14	8.4	100% 18,295.20
<b>TOTAL</b>		<b>71.38</b>	<b>154,920.8</b>
<b>ACRE FEET PER CYCLE</b>		<b>0.0002</b>	<b>0.48</b>
<b>Plants per Acre = 2,178</b>		<b>GAL/ACRE FOOT 325,851</b>	

Nursery plant water use would be accommodated within the above projected use numbers. The site is served by existing wells with water stored in tanks located adjacent to each hoop house. There will be a total of 21 water storage tanks onsite: 2 existing 1,000-gallon water storage tanks, 10 existing 5,000-gallon storage tanks, 1 existing 10,000-gallon storage tank, and 8 new 5,000-gallon water storage tanks. For fire water storage, there is an existing 2,500-gallon steel water storage tank and one new 5,000-gallon steel water storage tank is proposed.

The approximate volume of excavation for the installation of water tanks is under 2 CY cut / 2 CY fill with a total disturbance area of 950 square feet. No import of water is necessary or will occur in association with the proposed cannabis and supportive nursery operations. Cannabis activities have been occurring on the site since approval of the CCM. As such, infrastructure for irrigation is currently in place for 7 of the existing hoops. Irrigation lines will be expanded to each of the remaining hoops along the existing and established ag roads to limit disturbance and impacts to trees and vegetation on the property. Trenching will include a 6" x 2' deep excavation. Irrigation lines will surface to feed the cannabis plants in the above

ground pots. Additional water tanks for irrigation storage will be placed on level areas adjacent to the cultivation areas and only minor leveling is anticipated prior to placement of the tanks on the ground. The operation currently utilizes a generator for irrigation to pressurize the pump system to the hoop houses. The system is typically in operation between the hours of 7am-10am.

### **Energy Use**

The first phase of the project consists of outdoor cultivation with no supplemental lighting needs. A temporary generator (MultiQuip diesel powered AC generator, 60 Hz) is currently used to power water distribution and will be replaced with PG&E power when available. The project site currently has an application in process with PG&E to secure 3 phase power capacity in order to meet all of the project plan needs including utilization of an existing building on the site for future indoor growing. Energy use calculations for indoor use are provided with the Cannabis Application Supplement.

### **Other Resources:**

#### **Access/Air Quality**

Access to the site is provided from County Road # 22/Tierra Redonda Road, an unpaved road. The driveway onto the site is located approximately .73 miles from Lynch County Road, a paved County-maintained road. County Road #22 was established as a public highway in 1871 and while it still maintains its status as a County Road, it is not in the County maintained system.

In order to comply with the requirements outlined in Section 22.40.050.D.4.(Air Quality), the property owners will seek an annual encroachment permit from the County Public Works Department in order to provide road maintenance measures to reduce dust related impacts created by the additional traffic generated by the project. Maintenance measures could include the use of a water truck (non-potable water) or the application of dust binders on the road during harvest activities that occur in the dry summer months. Harvest operations are expected to generate an additional six to eight round trip vehicle trips a day over a one to two-week period. There is expected to be three harvests per year, in June, August and late October.

Traffic trips associated with the daily operations will be no more than that which would be expected with a normal rural residential / agricultural parcel (10 trips per

day per house), therefore mitigation dust mitigation measures are not required for the daily operational activities.

Dust and dust control is typically not a concern in the winter months however if winter is unseasonably dry, approved suppressants will be applied during winter / spring harvest activities to ensure that fugitive dust emissions do not exceed the 20% opacity limit identified in APCD's 401 "Visible Emissions" rule.

### **Biological Resources**

The proposed project area is located within a previously disturbed area onsite. The property has been in operation with various agricultural and ranch uses for several decades. No activity within 50' proximity to the drainages onsite will occur. Fencing surrounding the cannabis cultivation will be consistent with existing utilization of secure fencing on the property and will immediately surround the grow areas so as to not require additional tree removal. In the event that the additional hoop placement would require removal of oak trees, onsite mitigation planting will occur as required. A Biological Resources Assessment was completed for the project by Althouse and Meade and several protection measures are hereby incorporated into the project to ensure no impact to sensitive biological resources occurs with implementation of the project.

- BR-1.** Within one week of commencement of new Project activities, if work occurs between March 15 and August 15, nesting bird surveys shall be conducted. If surveys do not locate nesting birds, construction activities may commence. If nesting birds are located, no construction activities shall occur within a distance specified by a qualified biologist, until chicks are fledged, or the nest fails. Buffer radius shall be specified according to special status rank of the nesting bird, intensity of construction activity or impact (i.e. high decibel levels or heavy ground disturbance) and where local, state, and federal regulations apply. A preconstruction survey report shall be submitted to the County immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. The qualified biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.
- BR-2.** Prior to Project activities that affect shrub or woodland habitat, a preconstruction survey shall be conducted to locate Monterey dusky-footed woodrat nests within 50 feet of Project areas. The survey shall be conducted within 30 days of starting any grading, grubbing, or oak tree removal. Orange construction fencing shall be installed under the direction of a project biologist in a manner sufficient to protect the woodrat nests from construction equipment. If a woodrat nest is located in a construction zone, the project biologist may dismantle the nest using hand tools in such a manner as to allow any inhabitants to escape into adjacent open space areas. A preconstruction survey letter report shall be submitted to the lead agency for review within one week after completion of the survey, and prior to start of work.

- BR-3.** A qualified biologist shall conduct a preconstruction survey immediately prior to initial ground disturbance (i.e. the morning of the commencement of disturbance). If any special status reptiles or amphibians are found in the area of disturbance, the biologist shall move the animal(s) to an appropriate location outside the area of disturbance.
- BR-4.** Impacts to the oak canopy or CRZ should be avoided where practicable. Impacts include pruning branches greater than 4 inches in diameter, ground disturbance within the dripline or CRZ of the tree (whichever distance is greater), and trunk damage.
- BR-5.** Impacts to oak trees shall be mitigated by planting additional trees on site. Oaks removed shall be replaced in kind at a 4:1 ratio. Oaks impacted shall be replaced in kind at a 2:1 ratio. State in lieu fees may act as an alternative to replacement tree mitigation, at the discretion of the County.
- BR-6.** Replacement trees shall be one-gallon size or larger protected by tree tubes and root cages. Trees shall be of the same species of those removed (blue oak, valley oak, or coast live oak) and of local origin.
- BR-7.** Replacement trees should be seasonally maintained (browse protection, weed reduction and irrigation, as needed) and monitored annually for at least seven years, or as directed by the County. An annual monitoring report shall be submitted to the County.

### **Cultural Resources**

The cultivation activities consist of hoop houses within an existing and defined use area. All hoop house structures are on the ground already and the buildings are existing. No site disturbance is proposed that would be likely to unearth buried or surface cultural resources. A revised Phase I Archaeological Survey report was prepared by Padre Associates (September 2019) on the project site and expands information about the survey, Native American coordination, and corrects the records search as requested in a peer review. Recommendations are given that the isolated find area can be avoided as it lies within a dry ravine area that will not be impacted by project operations. See the revised report attached.

### **Visual Resources**

A Visual Impact Assessment was prepared by Firma (revised April 2020). Views to the project site are limited to travelers along Interlake Road and Lynch Canyon Road due the setback of the project site to the roadways and the existing dense vegetation located on the project site and along the roadways. The project site and its components may be briefly visible from key observation points on Interlake and Lynch Canyon Road. Therefore, landscaping is proposed in key locations to eliminate visibility of the project site. See the full Visual Impact Assessment report (April 2020) attached.

## Tree Study

A native tree impact assessment was conducted by Althouse & Meade, Inc. (December 2019). There are approximately 187 native trees onsite within proximity to the project area, of which 40 will be potentially impacted by the cannabis operations. It is recommended that an “As-built Report” be submitted after final completion of the Project to determine what (if any) impacts did occur to determine the number of trees requiring mitigation (2:1).

Tally of Trees by Species

Scientific Name	Dead	Protected	Potentially Impacted
<i>Arctostaphylos glauca</i>	2	25	1
<i>Pinus sabiniana</i>	0	17	6
<i>Quercus agrifolia</i>	0	5	1
<i>Quercus douglasii</i>	0	94	32
<b>Total</b>	<b>2</b>	<b>141</b>	<b>40</b>

NOTE: A final as-built impact analysis is recommended to inform final mitigation obligations for impacted trees.

Total Tree Count = 183      Tree tag numbers not included: 101, 106, 110, 114

DBH: Diameter at Breast Height      CRZ: Critical Root Zone

\*Trees not tagged due to inaccessibility to trunks.

\*\*Unattended stick nest observed in tree canopy.

## Parking Modification Request

The project site is designed to accommodate staff within the existing parking areas adjacent to the cultivation area (approximately 7 spaces). The cultivation operation will be operated by the property owner and five additional staff, 3 of which live onsite. Due to the limited nature of the staff required for the operation, parking standards as outlined in Chapter 22.18, Nursery Specialties are not appropriate for the project.

The following findings are provided for use in a request for modification of parking standards of Chapter 22.18, Nursery Specialties.

In accordance with Chapter 22.18.18.020.H, the following three findings support the request to modify the parking standards:

- a. The characteristics of the project, which consists of an owner-operated cannabis operation with limited staff, do not necessitate the creation of a designated parking area as the activities will be conducted by the property owner and staff (majority living onsite) who have parking provided on site outside the fenced cultivation area.

- b. The existing parking area is adequate to accommodate on the site all parking needs generated by the use, with pick-ups and deliveries conducted by the business owner and associates. No more than seven parking spaces are necessary, which are provided in the existing parking area.
- c. No traffic safety problems will result from the proposed modification of the parking standards as there is ample existing parking on the site for the operation.