

RIPARIAN BIOSUPPORT, INC.
PARCEL A
DRC2020-00095
(PREVIOUSLY DRC2019-00048)
MINOR USE PERMIT: OUTDOOR CANNABIS CULTIVATION
PROPOSAL
UPDATED APRIL 2021

Project Name: 1375 Klau Mine Road – Parcel A

Proposal: 3.75 acre area for Outdoor Cannabis Cultivation (3 ac canopy in hoop houses; 27,500sf Greenhouse (22,000sf canopy), 5,500sf Ancillary Nursery (Hoop Houses); Ancillary Transport

Parcel Size: Proposed (subject to COAL 18-0124): 50.50 Acres
Existing: 160 acres

APN: 014-331-064

Address: 1375 Klau Mine Road, Paso Robles, California

Land Use Designation: Agriculture

Williamson Act: No

Water: Existing 20 gallons per-minute well, two-inch water lines

Existing Land Use: Cattle grazing, irrigated row crops, agriculture building-workshop, residence-previous hemp cultivation

Adjacent Land Use: Cattle grazing, vineyards

Access: Paved San Luis Obispo County maintained Klau Mine Road, Existing 16' wide d.g. access road to existing planting areas

Overview

Riparian Biosupport, Inc. (Riparian Biosupport) is applying for a Minor Use Permit to authorize the cultivation of cannabis within a 3.75 acre area, totaling three acres of outdoor canopy (130,680 square feet) and an ancillary nursery (5,500 square feet) and greenhouse (27,500 square feet with a 22,000sf canopy). In March 2019, two Conditional Use Permits were submitted to San Luis Obispo County Planning and Building Department (DRC2019-00047 and DRC2019-00048) at this project site. Both submissions included multiple activities: cultivation, nursery, manufacturing, distribution, processing, and non-storefront dispensary. The project has transitioned to a Minor Use Permit to authorize the cultivation of cannabis, while cattle grazing and irrigated and dry-farmed products will continue to be raised on the remainder of the property outside the proposed site.

The property is registered through a Certification of Cannabis Cultivation Registration Case Identification (CCM2016-00120 Kirk Azevedo, D.C.). The proposed project has been designed in

full compliance with LUO Section 4, Chapter 18322.30 - Cannabis Activities as approved by the Board of Supervisors on 27 November 2017. No ground disturbance is proposed, as land preparation within the current project area has occurred for at least 40 years for irrigated and dry-farmed crops (personal communications, Skip Dodd 2018). The proposed project is located at 1375 Klau Mine Road, Paso Robles, California which is approximately 2 miles south of the Adelaida Cemetery.

SITE

The Riparian Biosupport cultivation located at 1375 Klau Mine Road (Accessor Parcel Number (APN) 014-331-064), in the North County Adelaida Sub Planning Area. Existing uses on the site include an Agriculture shop, irrigated crop farming, dry-farming, cattle grazing, and a residence (manufactured home). The location is zoned Agriculture and meets requirements set forth in the San Luis Obispo County Land Use Element Section 22.40 Cannabis Activities. The subject property is currently 160.18 acres and will be adjusted to 50.50 acres through a Lot Line Adjustment (COAL-08-0124).

EXISTING CONDITIONS

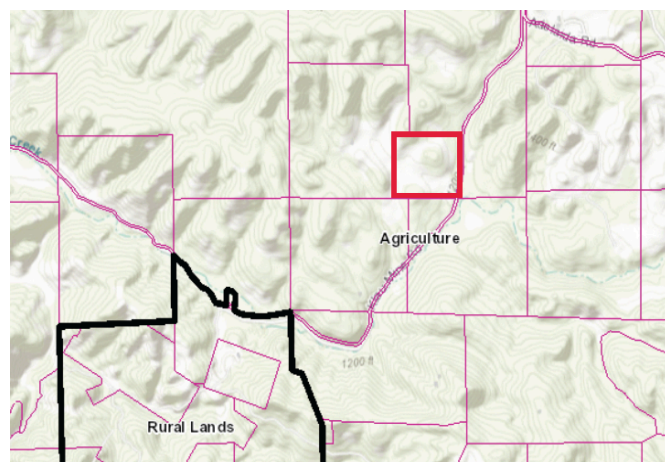
The property is in a sparsely developed region of the county with very low human population density and larger parcel sizes (100+) acres. The site's topography is relatively flat with an average slope of 5% and no areas of cultivation greater than 10%. The site consists of existing, undeveloped irrigated farmland. The site was previously used for hemp cultivation (under Urgency Ordinance 3393 until it recently changed) in most of the areas that are proposed for cannabis cultivation.

NEIGHBORHOOD COMPATIBILITY

Riparian Biosupport has deliberately selected the property to conduct cannabis-related operations because it is remote, the site is generally not visible from the public road or residences and conforms with existing land use within immediate proximity. All cannabis-related operations will be in full compliance with San Luis Obispo County Land Use Ordinance 22.40.040.

Cannabis cultivation is consistent with previous and current agricultural use of the property and surrounding area. The general direction of the prevailing winds is east. Any motion detection lighting used for security will be cast downwards to reduce light pollution. There is no projected increase in noise level from this project.

The property is surrounded by Agriculture and Rural Lands, land use designated lands which consist of agricultural uses: cattle grazing and vineyards. There are not any schools, libraries, parks, playgrounds, recreation or youth centers, licensed drug or alcohol recovery facilities or licensed sober living facilities within 1,000 feet of this subject property. The nearest neighbor (southeast adjacent parcel APN 014-331-065), is 2,500' away from the outdoor cultivation area.



NEIGHBOR NOTICE

An original notice was provided to nearby residents within a 1,000' radius, in March 2019 when the initial application was filed. This project has since been simplified and a courtesy re-notice was resent February 13, 2020 notifying the same residents of the reduced project scope. A copy of such letter is included in this updated project application and the list of neighbors is provided on the plan set title sheet.

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. This site will be +/- 50 acres which will allow up to 3 acres in canopy, 22,000sf canopy indoor cultivation and ancillary uses. Outdoor cannabis cultivation will occur onsite within various clustered 10,000 sf in ground plots and larger in ground plots nearby (refer to site plan). County standards also allow an ancillary nursery so long as it doesn't exceed 25% of the proposed outdoor canopy area. There is a total 130,680 SF outdoor cannabis canopy proposed which would allow up to a 32,670 SF nursery. The applicant is proposing a +/- 5,500 SF ancillary nursery (5,000f canopy). Additionally, the ordinance allows a 22,000sf canopy for indoor cultivation and a 27,500sf greenhouse structure with 22,000sf is proposed.

Cannabis Activity	Proposed Canopy		Proposed Gross		Max Allowed	
	SF	Acres	SF	Acres	Canopy	Gross
Outdoor Cultivation	130,680	3	163,350	3.75	3 acres	3.75
Greenhouse	22,000	0.5	27,500	0.63	32,670sf	40,837sf
Ancillary Nursery	5,000	0.11	5,500	0.13	32,670sf	40,837sf
Ancillary Transport	N/A	N/A	3,600	0.08	N/A	N/A
Pesticide Storage	N/A	N/A	320	0.007	N/A	N/A
Fertilizer Storage	N/A	N/A	320	0.007	N/A	N/A

Item #	Use/Activity Proposed	Specific Component	Square Feet	
			Canopy	Gross
1	Outdoor Cultivation	within hoops	130,680	163,350
2	Ancillary Nursery	new structure	5,000	5,500
3	Greenhouse	new structure	22,000	27,500
4	Parking		n/a	815
5	Ancillary Transport	existing transport -hemp	n/a	3,600
6	Composting Area	existing compost -hemp	n/a	6,300
7	Trash Recycling Area		n/a	300
8	Septic/Leach Field	exisitng- no new proposed	n/a	0

9	Water Tanks	some existing some new	n/a	2,000
10	Pesticide Storage/Fertilizer Storage	8'x40 cargo containers (2)	n/a	640
11	Restroom (s)	existing in ag shop/barn	n/a	400
12	Solar			3,000
13	Overflow Parking			3,300

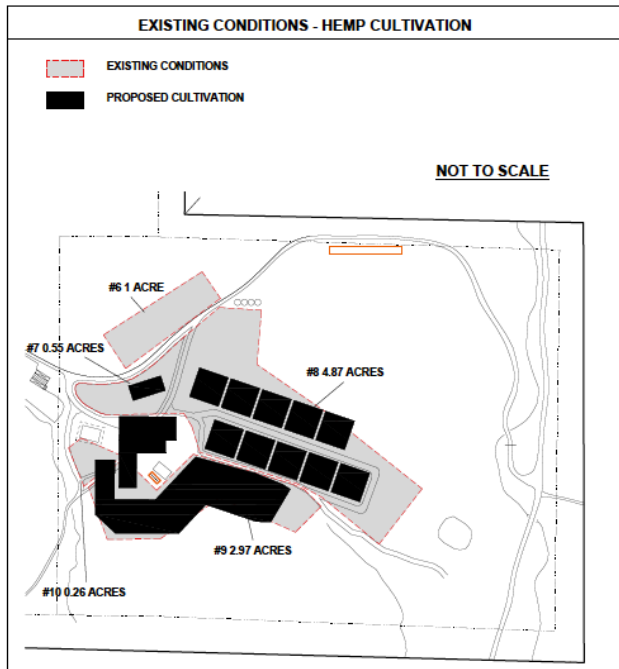
Outdoor Cultivation

Outdoor cultivation is limited to a maximum of three acres comprised of multiple co-located state licenses. Each premise shall be clearly defined from one another, as defined in *Article 1, Section 8000 – Definitions, Premises, State of California Regulations*.

Three acres (130,680 square feet) of outdoor cultivation area will be cultivated on 3.75 acres of land within a clustered area located center portion of the property and an area which has previously been used for hemp cultivation and other farming. The applicant would like to have the option to plant in ground or in pots.

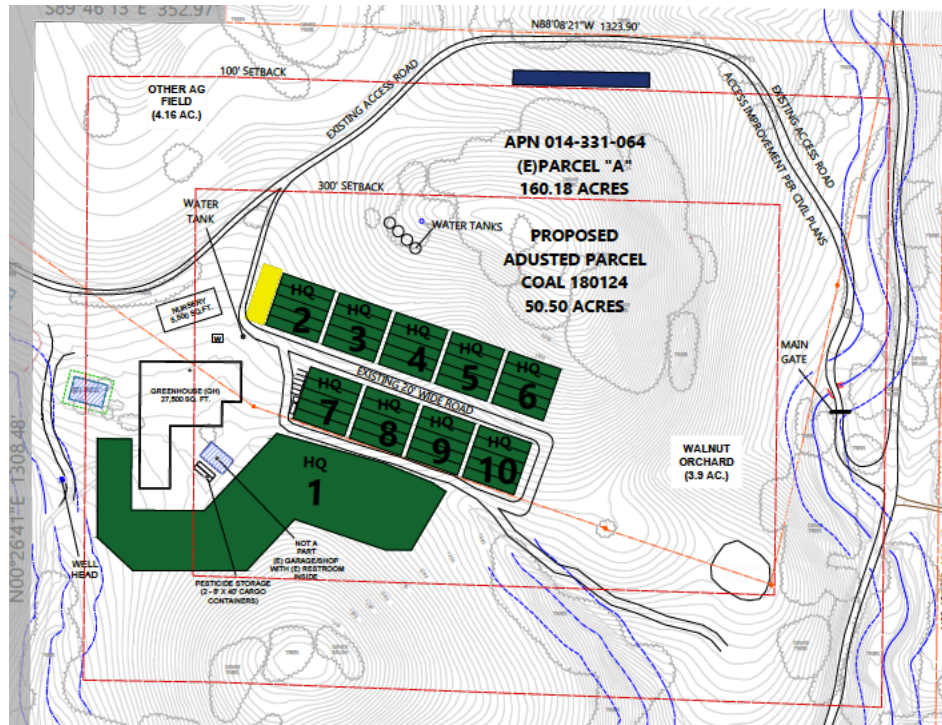


Photograph 1: Previous Cultivation under CCM permit, near barn (this area is proposed for continued outdoor cultivation).



Photograph 2: Previous hemp cultivation (new nursery location)

Proposed Site Plan



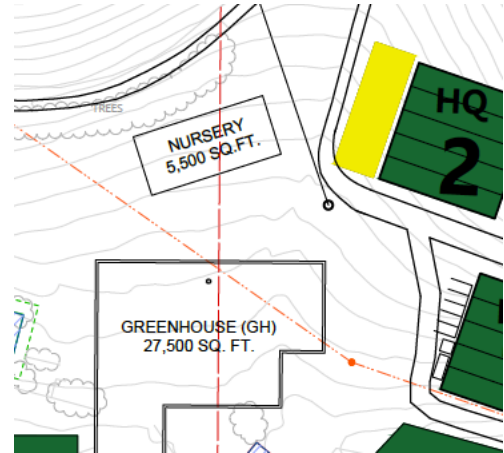
Greenhouse

A 27,500sf indoor cultivation structure- greenhouse is proposed at the center of the operation. The area where sited was previously used for hemp cultivation. The structure will be polycarbonate material and have a 22,000sf canopy, max allowed, cultivation to be grown in pots. Floor plans and elevations are included with this submittal.

Ancillary Nursery

A +/- 5,500 sf ancillary nursery (+/- 5,000sf canopy) is proposed adjacent to the greenhouse. This area has operated in the past under the applicant's CCM license (previously hemp seeds were cultivated in hoop houses where HQ1 is proposed). Cultivation to occur in pots.

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.



Ancillary Transport

Product will be sold as whole, wet flower. Flowers will be taken off plants in the field, weighed, documented, and loaded into refrigerated, licensed transportation (most likely refrigerated truck) for off-site processing by licensed distributors/processors. There is a designated transport area where product will be loaded into secured vehicles and transported offsite to a licensed processing facility. The area is 3,600sf-refer to site plan. Minimal grading improvements to level the area are included in the grading plan area of disturbance quantities. The area is d.g., linear section along the existing access road. This operation will stay the same except it will now be fenced in and secured, limited to employee access. The transport is only for cannabis grown onsite and not for immature plants/clones from the ancillary nursery. This transport area is also NOT used as a dispensary or distribution.



Photograph 3: Cargo Transport area for hemp (to be used for cannabis)

Grading Activities:

A grading plan was prepared to show quantities for two adjacent parcels: this parcel 1375 Klau Mine Rd. and 1385 Klau Mine Rd. The following quantities are proposed for site disturbance, for this parcel, in order to create building pads and infrastructure and access to the new greenhouse and nursery. Access improvements to widen the existing driveway to meet Cal Fire commercial access

standards are necessary for the dual benefit of Parcel A and B are also included in this calculation:

PROJECT STATISTICS 1375 KLAU MINE RD (PARCEL A)

Cut 4428 CY± , Fill 3650 CY± , Total 8078 CY±

Max. cut = 9 ft, Max. fill = 7 ft

Average slope > 10%

Parcel Area = 50.50 act

Pre-Project (sf ±)

Impervious Area = 0 , Total Project Area = 215464

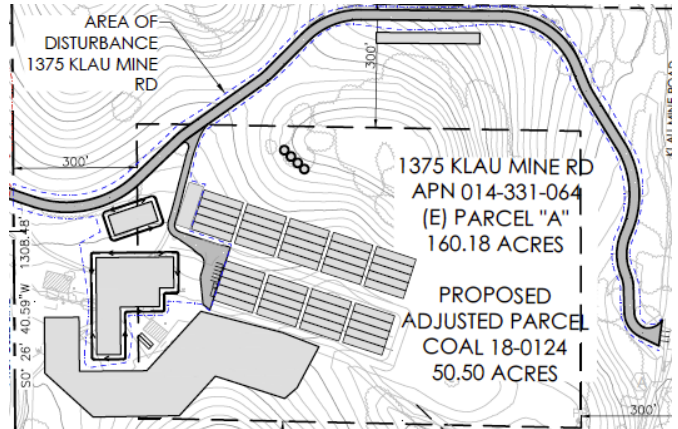
Post-Project (sf ±)

Total Impervious Area = 33,000, Pervious Area = 182464

New Imp. Area = 33,000, Removed Imp. Area = 0

Replaced Imp. Surface = 0

Total Site Disturbance = 215464



OPERATIONS

Access

The parcel is accessed from 1375 Klau Mine Road, a 24 foot paved roadbed maintained by San Luis Obispo County. There is an existing paved apron that tapers off Klau Mine Road to the property existing security gate entrance (Photograph 2). Legal access is established with an easement as Klau Mine Rd. crosses over Parcel A. The easement is 30' wide and is for ingress/egress per Doc No. 2009031372 O.R. The proposed cultivation site is accessed through the property on an existing 16 feet all-weather access road that stems off of said easement (Klau Mine Rd). The easement is currently being updated with the recent LLA proposal and is attached for reference. Widening improvements will be necessary to accommodate a commercial onsite and quantities are included above under 'Grading Activities'.



Photograph 2. Existing Gated Entrance, View to the Northwest.

Security

Significantly, security will be greatly enhanced by the nature of the proposed cultivation only plan. Crime and theft exposure are greatly reduced when transporting the product off of the site when it is still wet. Time-risk exposure is reduced by approximately 95% and the value of the product per unit weight is reduced by 90%. This practice is consistent with the other high-value crops we grow such as avocados which are shipped off the farm and to the distributor as soon as possible after

picking the fruit. The proposed security plan includes a secure main gate and security cameras overlooking the cultivation areas. Security cameras will be placed at all cultivation area access points, along with a field of view of each cannabis area as well as the product loading/transportation area (refer to site plans included in this submittal). Cultivation areas will have complete visual coverage through the network of surveillance cameras. The site will operate in full compliance with State Licensing requirements for track and trace which will further ensure adherence to security protocols. A 5-string barbed wire fence runs along the propertyline and an additional locked gate is located at the ranch entrance. Security camera locations are identified on the security site plan. Additional security details are provided on the attached Security Plan.

Odor Management

San Luis Obispo County Land Use Ordinance 22.40.50.D.8 outlines requirements for Nuisance Odors from cannabis cultivation. The ordinance details that all cannabis cultivation shall be sited and/or operated in a manner that prevents cannabis nuisance odors from being detected offsite. The proposed operations are not anticipated to cause any odor issues. Odor from the cultivation areas is naturally mitigated by the distance to the nearest residence being over 2,500 feet away, the existing dense vegetation, and topographical relief. The topography and dense vegetation create a natural landscape buffer that prevent odor drift. The project is designed to fully comply with setback requirements (aside from project internal setbacks) as specified in Section 22.40.050.D.8-Nuisance Odors, and as a result, the project meets requirements for mitigating nuisance odors arising from the project.

Signage

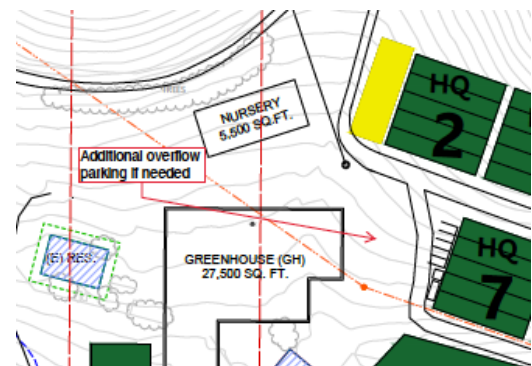
No exterior signage distinctive to the cannabis operation is proposed. Signage inside and outside the facility shall indicate the facility is under surveillance twenty-four hours seven days a week. Signage must also indicate that consumption of cannabis on the premises or in the immediate vicinity of the premise is prohibited. One sign approximately 4 x 4 feet noting the following will be posted at the sites entry:

- Riparian Biosupport
- 1375 Klau Mine Road, Paso Robles, California
- “Anyone entering this site must register upon entry”

Parking Plan

The property site provides ample parking areas for the cultivation operations and are not in conflict with any adjacent properties or uses. Onsite parking will be provided to accommodate up to five parking spaces to serve employees (four regular and one ADA spaces).

Parking will be located on an all-weather-surface, clearly demarking standard 9’x18’ parking spaces, product loading areas, accessibility symbols, and one (1) van accessible parking area and loading area are to be provided. There is additional 3,300sf overflow parking area available if needed-refer to site plan. However, no more than 11 employees are needed at peak harvest and there is adequate parking area provided.



Parking Modification Request

Modification of parking standards is requested under this Minor Use Permit and is consistent with Chapter 22.18. The project will require limited staff (11 max during harvest). The overall site manager will live onsite which makes one less parking space necessary. Harvest employees will carpool.

Equipment parking for tractors, forklifts, and other farm equipment shall be in designated areas and shall be maintained to mitigate spills from oils, hydraulic fluids, coolants, or other solvents by incorporating Secondary Containment and Best Management Practices.

County LUO requires nurseries to provide one space per 500sf of floor area for indoor nursing facilities. The total required parking for indoor structures would be 60 spaces and on ADA space (assuming 30,200sf floor area (nursery and greenhouse). 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 11 employees total during harvest which occurs for a few days, five times a year and includes full time employees. Carpool measures will also be implemented. Four full time employees will be onsite at all times overseeing the operation, one of which resides onsite. No traffic safety problems will result from the proposed modification of parking standards. All parking, including an overflow parking area (unimproved) is located adjacent to the cultivation site and indoor structures, refer to site plan. Furthermore, the site has operated under its CCM license with this same number of employees and parking without incident.

Staffing and Employee Safety

The proposed operations are agricultural in nature and conducted according to controls in place for the industry. No manufacturing, dispensary, processing or distribution activities are proposed. No public access to the site will occur at any time. The operation is defined in the table below:

Hours, Staffing, Harvests, Trips

Category	Component	Outdoor Cultivation	Indoor Cultivation, Nursery, & Processing	Maximum # Employees
Typical Season	Months of Operation	March - November	Year Round	4 full-time
	Hours of Operation	7 am – 8 pm, 7 days / week		
	Deliveries to site / month (vehicle type)	7 (van / truck)		N/A
Harvest ¹	Harvest # per Year / (Months)	2 per year / (June/July & Oct/Nov)	5 per year / (spread out during the year)	7 seasonal
	Hours of Operation	6 am – 8 pm, 7 days / week		
	Deliveries from site / month (vehicle type)	2 (van/truck)		N/A

Notes: ¹Deliveries to/from site during harvest are incorporated into typical totals.

Traffic

Typical traffic trips involve those created by the four full time employees (4 round trips) and some deliveries associated with administration (typical fed-ex type supply deliveries). Daily trips should not exceed 10 trips during typical operation. Harvest trips may add another 11 daily round trips for employees; however, these employees will most likely carpool as they have in the past with the hemp production.

Transport for each harvest will require 5-10 trips weekly during June/July and Oct/Nov for the outdoor product and an additional 5-10 during indoor harvest which occurs 5-12 times a year. Transport will be provided with an outside licensed transport (refrigerated truck/van that can enclose product) that will come and pick up product in the designated transport area and take product to a licensed facility for further processing. At any time (factoring in harvest, transport and max employees onsite) the site should not require more than 30 daily trips.

Water Management Plan

The site is served by one existing groundwater well that has historically served the property for agricultural use. (See attached well pump and irrigation water crop compatibility tests). No import of water is necessary or will occur in association with the proposed cannabis cultivation operations. Limited surrounding agriculture combined with high recharge potentials support the land use of commercial cannabis cultivation. The projected water usage for all cannabis operations is 4.44-acre feet per year (refer to attached Water Management Report-separate cover by Wallace Group). Water saving practices will include the use of drip and micro-sprinkler irrigation emitters. Wi-Fi connected water moisture sensors will be used to determine optimal irrigation timing. The availability of water for the proposed project is evidenced by the well test report by Farm Supply, Paso Robles. The report documents a well producing 21 gallons per minute, with a recovery time of nine minutes 35 seconds proving ample available water for all existing, proposed uses, and reserve capacity for emergency fire response. The tables and excerpts below are quoted from Wallace Group's water use evaluation report dated July 13, 2020:

Use	Rate	Gross Demand (gallons/ year)	Gross Demand (AFY)
Outdoor Cultivation: 130,680 sf	130,680 square feet canopy area x 0.03 gal/sf/day x 180 days	705,672	2.17
Indoor Greenhouse Cultivation: 22,000 sf	22,000 square feet canopy area x 0.1 gal/sf/day x 270 days	594,000	1.82
Indoor Nursery Cultivation: 5,500 sf	5,500 square feet canopy area x 0.1 gal/sf/day x 270 days	148,500	0.46
Total New Water Demand			4.44

Table 2. Estimated Monthly Water Demand for Cannabis Cultivation					
Month	ETo (in)**	Outdoor ETo During Growing Season (%)	Outdoor Cultivation Water Use/Month (AF)	Indoor Water Use/month (AF)	Total Water Use/month (AF)
October	3.50	-	-	0.19	0.19
November	2.02	-	-	0.19	0.19
December	1.51	-	-	0.19	0.19
January	1.69	-	-	0.19	0.19
February	2.24	-	-	0.19	0.19
March	3.72	-	-	0.19	0.19
April	4.76	13.5	0.29	0.19	0.48
May	6.03	17.1	0.37	0.19	0.56
June	6.56	18.6	0.40	0.19	0.59
July	6.60	18.8	0.41	0.19	0.60
August	6.30	17.9	0.39	0.19	0.58
September	4.94	14.0	0.30	0.19	0.49
Total	49.87	100%	2.17	2.28	4.44

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

Water Offset

The project site is not located within the Paso Robles Groundwater Basin and therefore the new water demand of 4.44 AFY is not required to be offset.

Water Supply

There is an existing 5,000 gallon water tank onsite and an additional four- 2,500 gallon tanks planned to be added for the project use.

Wastewater and Cannabis Waste Material

Cannabis cultivation will not produce any wastewater, as all water is used within the planting environment. All surface water runoff will be managed and adhere to best management practice set forth by the Regional Water Quality Control Board. An erosion control plan is also included in the preliminary grading and drainage plans included in this package. All green waste consisting of dead and/or stripped of flower plants in the field and soil is composted onsite within the site cultivation's composting area. The composting location, was an existing compost location for past hemp activities and will not require grading and be accessed on foot or a recreational vehicle such as a 'gator'. 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. These containers are identified as 'W' on the site plan. The attached Waste Management Site Plan provides additional details.



Photograph 3. Composting Area, View to the Southeast.

Domestic waste will be treated with an existing restroom area within the barn onsite. The restroom was used previously for hemp and farm employees and will need to be verified during the building permit process for additional capacity (since this is a ‘commercial’ use-suggestion to be placed as a condition of approval. The remainder of the barn is ‘not a part of the cannabis’ aside from the use of the restroom.

Pesticide and Fertilizer Usage

Pesticide and fertilizer usage will be in accordance to the County of San Luis Obispo Department of Agriculture standards. The applicant has a Pesticide Operator Identification Number (PA-4080065) and shall receive, store, apply, and dispose of such fertilizers, pesticides and other materials in full compliance with applicable regulations. All pesticides are stored in the pesticide storage cargo container (8’x40’), with appropriate signage. All fertilizers are stored in the fertilizer storage cargo container (8’x40’). The pesticide/fertilizer storage containers will be located behind the existing barn.

All materials stored within the pesticide storage container will be conducted according to standard good agricultural practices.. Strict compliance with the County Ag Commissioners Office and the Regional Water Quality Control Board and California Department of Fish and Wildlife will be followed. Further details are included in the attached Hazardous Material and Pesticide Plan.

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 unless a modification request is made. The cultivation area will be at least 300’ foot setback from the northern property line, 300’ foot setback from the southern property line, and a 300’ foot setback from the eastern property line. A setback modification request is being made for a 120’ foot setback from the western property line since that property is managed by the same entity, and with the same cannabis land use.

The nearest sensitive receptors (schools, parks, libraries, licensed recover facilities, et. al) are located well outside the 1000-foot setback required by Land Use Ordinance Section 22.30.D.1. The Agriculture zoned parcel size of 50 acres meets the size requirement of 25 acres for 3 acres of outdoor cultivation.

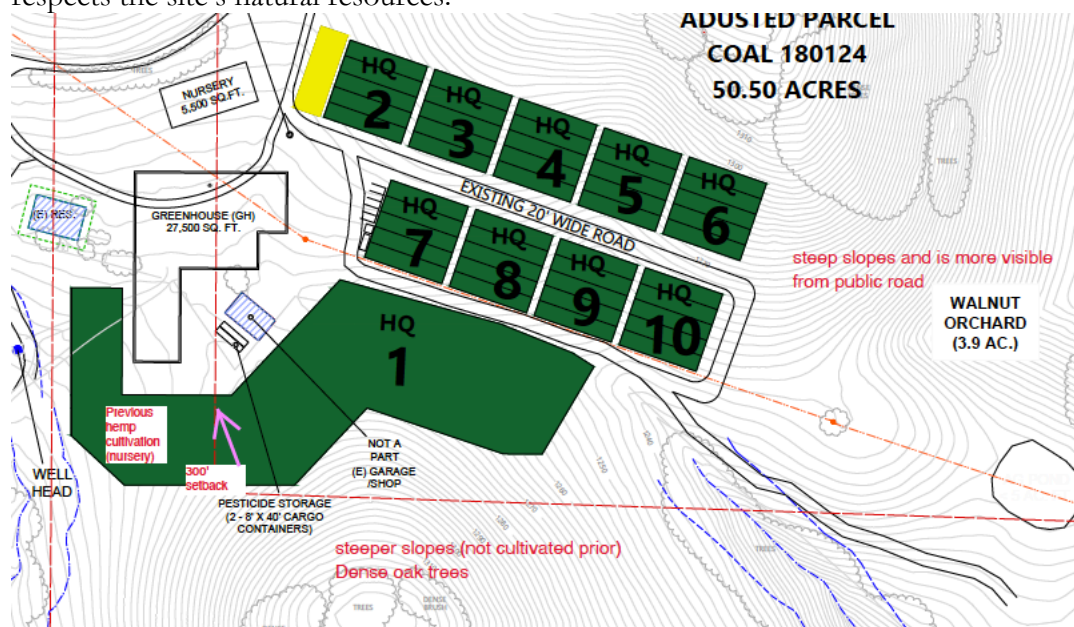
Setback Modification Request

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.”

Parcel A is requesting a setback modification for its western setback since it is 120' from the property line and 300' is required. The western setback is an internal setback between two parcels under the same operation. The parcel line in which the setback modification is requested is one which is shared with Parcel B. Parcel B is also requesting a 3 acre outdoor cannabis cultivation operation which will share some of the same amenities as Parcel A such as storage and compost areas. The reduced setback will not cause an odor nuisance to this parcel as this parcel is proposing the same cannabis operation. Additionally, on the opposite side of the parcel line is a very large oak grove which is illustrated on the site plan below. This dense vegetation would also prohibit any odor drift.

If the 300' setback were to be met along the westerly property line, then it would be pushing the cultivation area into an existing drainage area and hillside of oak grove. The current cultivation location was chosen as the most environmentally sensitive location, has been utilized for cultivation and farming prior to this proposal under a CCM permit. Additionally, the current configuration respects the site's natural resources.



In conclusion, the cultivation layout encroaches the required 300' setback from the western property line in order to avoid tree removal, creek impacts 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. Furthermore, the requested setback location is adjacent to a planned cultivation project that is planned under this same operation, which constitutes another setback modification

finding-no odor nuisance when it is abutting a parcel with the same use. Odor nuisances off-site will not be of concern as the location far exceeds the 300' setback for neighbors outside of the operation and is significantly screened with topography and dense oak populations.

Air Quality

The project is located on an existing agricultural site, accessed through a private driveway. Some improvements will be necessary to slightly widen to meet Cal Fire standards. Standard air quality grading mitigation measures will be applied.

Dust Control

Dust suppression measures will be applied to the existing access road for operation mitigation. 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.

Screening and Fencing

A security fencing and camera exhibit is included in the plan set. There will be a new 8' solid fence that will encompass all cannabis activities. The site has an existing main controlled gate with a camera down at Klau Mine road. Parcel A will have a new fence gate (like the perimeter fencing) that will access the cannabis-controlled area. There will be cameras and motion detector lighting every 100' along the perimeter fence. Additionally, the site is not visible and screened with topography and dense oak groves which makes it impossible to see the operation from public view. There will most likely be an onsite manager that is available 24/7 for security purposes.

Cultural Resources

The Cultural Resources Survey Report (Joslin 2018) is provided under separate cover. An updated letter that corresponds to the latest project plans is provided as a supplemental review.

Biological Resources

An updated Biological Resources Report (Merk 2020) is provided under a separate cover.