County of SLO
10 FEB 2020
Planning & Building

AGZONE SERVICES, LLC

DENNIS RISDEN | ROGER RISDEN MINOR USE PERMIT - CANNABIS CULTIVATION PROJECT DESCRIPTION (REVISED: 2/7/2020)

DRC-2018-00079

PROPOSAL

- Minor Use Permit:
  - Outdoor Cultivation (3ac)
- Landowner: Charles Kuhnle
- Applicants (Lessees): Dennis Risden, Roger Risden
  - NOTE: Neng Yang is no longer a part of this application, and Dennis and Roger will each cultivate 1.5 acres for a total of 3 acres outdoor cultivation.
- Agent: AGZONE Services, LLC

The following application is for a Minor Use Permit to establish an outdoor cannabis cultivation operation. The outdoor cultivation involves three acres of row crops.

SITE

- Address: 11525 Tule Elk Lane, Santa Margarita, CA 93453
- APN: 072-301-010
- Acreage: 46 acres
- Land Use Designation: Agriculture

EXISTING USES

One residence, an ag exempt barn and multiple small accessory structures occupy the property. Existing access is from a shared, paved private road (Tule Elk Lane,). The remainder of the site is dry farmed. The topography is flat.



Figure 1. View of existing structures from HWY 58



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BACKGROUND

The applicants are Dennis Risden and Roger Risden. They have contracted with AGZONE Services, LLC to lease the subject property and operate the new grow. The landowner, Charles Kuhnle, has leased the subject property to AGZONE Services, LLC and applicants. The applicants both have previously existing medical cannabis outdoor cultivation operations (totaling 11,440sf) in San Luis Obispo County, information listed below.

Name	County Reg No.	Previous Grow Site Address	Plant Count	Area (sf)
Dennis Risden	CCM2016-00035	8111 Dos Canadas Rd, Santa Maria, CA 93454	48	820
Roger Risden	CCM2016-00036	8101 Dos Canadas Rd, Santa Maria, CA 93454	48	620

The proposal will relocate these operations to the subject property discussed in this project description.

PROJECT DETAILS

According to County of SLO LUO Section 22.40, outdoor 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. The outdoor cannabis cultivation will occur onsite within a distinguished canopy and protected by fencing.

Outdoor Cultivation

The applicants have a combined 3-acre canopy for their outdoor cultivation operation under CCM's noted above. They are proposing to relocate this operation to the subject site in order to operate under the recent medical and adult cannabis use state and county regulations.

The site for cultivation is vacant and tilled. Outdoor cultivation will occur row crops. This area will be enclosed with a chain link fence no higher than 8' or as required (slatted and gated for security purposes, or as required). A detail of the proposed fence is included at the end of this project description.

Cal Fire visited the site on 5/10/18 and provided recommendations for access and water supply for the cultivation operation. CalFire met with the agent on 1/24/2020 to discuss requirements with proposed changes (Please see attached email). As a result, the project will implement a 5000 gallon water tank with fire hose hook up as well as a 16' wide fire access road to the edge of the cultivation canopy. This road will include a hammerhead turnaround.

Land Preparation

The ground is prepared by first disking three times, chiseling (ripping) (3 feet deep) four times and disking again three times. Fertilizer and amendments may be applied as allowed. Planting beds are then listed and shaped.

Plant Stock

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

Planting

Cannabis is planted as early as April 1st each year. Plant spacing may vary depending on the strain. A planting density between 100 and 40,000 plants per acre may occur.

Trellising

Some strains may require trellising to support the plants weight.

Plant Nutrition

Applications of N-P-K fertilizers will be based on soil or plant tissue tests, which quantify fertility needs and determine a fertilizer program. Fertilizer will be applied directly to the ground . Gypsum may be incorporated into the soil at the rate of 2 tons-per-acre.

Training/Pruning

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

Irrigation

Drip irrigation will be used for all cannabis irrigation. Irrigation water is sourced from groundwater aquifers through agricultural wells. Well water is pumped using electrical power. All irrigation is applied through the drip system to match crop evapotranspiration and to account for 85% irrigation efficiency. The drip system requires chemical flushing to retard calcium build up and emitter clogging. Chemical flushing is performed after harvest with N-pHuric acid applied through the drip system with 0.5 acre-inch of water. Up to two drip irrigation lines are installed per row. Beds may be covered with plastic mulch using a mulch laying implement.

Plant Establishment

Uniquely identified ('Track-and- Trace' tagged) cannabis plants are delivered to the field edge and then transplanted. Fields are irrigated with roughly 1.5 acre-inches of water immediately after planting. Fertigation may be used to help establish plants.

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

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

Yields

An estimated season yield of 5,445 pounds-per-acre of dried plant mass is used to reflect yields under sub-surface drip irrigation. The yield will vary based on strain selection and planting date.

Harvest

The crop is harvested when it is ripe. Crew size is 10 to 12 people. The flows of the plant are removed from the stalks with destemming equipment.

Plant material may either be dried in the field, stored temporarily (less than 72 hours) in a secured transport vehicle, or immediately transported to a licensed facility.

Fencing

A fence up to 8' high or as required with slatted chain linked fence, or as required, will encompass the outdoor cultivation. The fencing will provide both a visual barrier and security. Refer to the site plan for location



Figure 4: Concept of proposed fencing.

Lighting

No artificial lighting proposes aside from minimal necessary for security. Lighting will be incorporated within seven (7) solar-powered portable security units. They will be deployed inside the fence-line, one at each corner of the site and one each in the middle of the long edges of the site. Lighting will be shielded and manually-activated in the case of a security incident during the hours of darkness. Once the security incident is resolved, the lights will be manually turned off.

Site Context

Neighborhood Compatibility

This 46-acre parcel (+/-) is surrounded by the Topaz Solar Farm as well as rural residences and other agriculture.

Properties to the immediate north, east and west have also filed applications to cultivate cannabis. Their operations will be managed by AGZONE Services, LLC by separate landowner agreements. There aren't any schools; alcohol or drug facilities within 1,000 of this subject property or anywhere remotely close within vicinity. The nearest source is around 15,000 feet away and is the Carrisa Plains Elementary School.

Access

Existing access is taken off of HWY 58 onto Tule Elk Lane, which is a private and shared access road that serves three parcels. The road is paved and is approximately 20' wide. A road maintenance and dust mitigation agreement has been provided with this

application.

A private, 16' wide road on the subject property will access outdoor cultivation locations. This road will have a locked gate for security. A 16' wide fire road will reach the edge of the cannabis cultivation canopy.

Parking Modification Request

A designated parking area with 5 spaces will be located adjacent to the outdoor cultivation site, outside of the fenced boundary, refer to the site plan.

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

a. The characteristics of use, the site, or its immediate vicinity do not necessitate the number of spaces, types 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 modification of parking standards.

The characteristics of use for the site do not necessitate the number of parking spaces required by Chapter 22.18. The plan is for strictly outdoor cultivation; one harvest per year is planned. The cultivation strategy is for minimal-touch growing, similar to a typical vegetable crop.

Here is the planned work schedule for one year:

Planting and Growing: up to 5 workers will be collectively working full time to service this cannabis cultivation and the other three adjacent cannabis cultivation sites.
Harvesting: 10-12 workers for 4 days
Maintenance: Contractors will be hired to maintain equipment and fixtures as needed. Maintenance contractors are expected up to 14 days per year.

Reduced parking of five spaces will be adequate to accommodate on the site all parking needs generated by the use. Excluding harvesting, a maximum of 5 workers will be onsite simultaneously. For harvesting, all workers will carpool. Total number of cars onsite will not exceed 5. No traffic safety problems will result from the proposed modification of parking standards. All parking is located adjacent to the cultivation site.

A designated parking area with 5 spaces will be located adjacent to the outdoor cultivation site, outside of the fenced boundary, refer to the site plan.

Signage

No signage is proposed at this time.

Setbacks

The outdoor cultivation area meets the 300' required setbacks to the north, east, and south. The western property line will have a setback of only 36.14' however the property to the west that shares this line also has submitted an application for cannabis cultivation.

Setbacks and Modification Request

Natural water resources have been identified on this property and the applicants seek to avoid impacting these areas when possible. Applicant also seeks to not disturb existing developments. Consequently we are requesting a setback modification on the western property line so as to avoid these water resources.

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

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

The proposed outdoor cultivation area is situated 36.14' from the western property line and is well over 300' from the other property lines. The western property line is adjacent to another proposed cannabis cultivation project. Additionally, the site has existing development, as well as natural water resources which minimize potential site locations further. The proposed cultivation area will avoid the sensitive areas and will not disturb existing developments. Other alternatives were considered but deemed infeasible since the natural water resource area takes up a significant portion of the property.

OPERATIONS

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

Employee Safety and Training Plan

The operations will be run by AGZONE Services, Lessee. Part of their role is to properly ensure the safety of the site and their employees. The Employee Safety and Training Plan has been previously submitted.

Security

Site security will be provided by a state-compliant security system. High definition cameras on board solar-powered, mobile security units will oversee ingress/egress locations and also surveil the cultivation area. Included on these units is manually-activated LED security lighting, using the All-Pro FSL2030LW box light (or similar). Each station will have two of these LED light systems, each providing at least 1950 lumens. All lighting will be shielded, and the only use will be for the illumination of security incidents at the site, during hours of darkness. Lights will be extinguished after the resolution of the security incident. The normal state of the site will be "lights-out" at all times.



Figure 6: All-Pro FSL2030LW Box Light

The detection of motion by the security system will trigger alerts to the mobile devices of trained security personnel, the permittee, the landowner, and other key personnel. Real-time video will be presented to the user so the appropriate action plan can be implemented.

Public access will be restricted and achieved with the installation of an electronic key code security gate at the entrance of Tule Elk Ln., and two secure gates for the fence that surrounds the cultivation area. All camera and gate locations are identified on the site plan. An additional mobile unit will be located at the gated access to Tule Elk Ln.

Fire Safety

Cal Fire visited the site on 5/10/18 and provided recommendations for access and water supply for the cultivation operation. CalFire met with the agent on 1/24/2020 to discuss requirements with proposed changes (Please see attached email). As a result, the project will implement a 5000 gallon water tank with fire hose hookups as well as a 16' wide fire access road to the edge of the cultivation canopy. This road will include a hammerhead turnaround.

A 5,000-gallon galvanized steel water tank will be installed on a compressed gravel pad outside the fence line. The tank will have a 4" fire hookup that will be accessible within 12' of the access road. The tank will also be used as a source of irrigation water for the grow sites. Accordingly, the tank will have a booster pump and a nutrient injection system.

Odor Management

The proposed operation is not anticipating any odor nuisance since the adjacent properties are proposing operation of the same use. Additionally, this site is an extremely remote area and adjacent to the Topaz Solar Farm.

Pesticide and Fertilizer Application

A list of pesticides and fertilizer products are included as an attachment to this project description. All products are non-hazardous and in compliance with the Department of Pesticide Regulation (DPR) and the County of San Luis Obispo Agricultural Commissioner (CAC).

Pesticide plans will evolve and change depending on pests we encounter on site and will be varied to avoid pest adaptation. Planned pesticides will be selected from the following list:

Insecticides and Miticides

Azadirachtin • Bacillus thuringiensis sub. kurstaki • Bacillus thuringiensis sub. israelensis • Beauveria bassiana • Burkholderia spp. strain A396 • Capsaicin • Cinnamon and cinnamon oil • Citric acid • Garlic and garlic oil • Geraniol • Horticultural oils (petroleum oil) • Insecticidal soaps (potassium salts of fatty acids) • Iron phosphate • Isaria fumosorosea • Neem oil • Potassium bicarbonate • Potassium sorbate • Rosemary oil • Sesame and sesame oil • Sodium bicarbonate • Soybean oil • Sulfur • Thyme oil

Fungicides and Antimicrobials

Bacillus amyloliquefaciens strain D747 • Cloves and clove oil • Corn oil • Cottonseed oil • Gliocladium virens • Neem oil • Peppermint and peppermint oil • Potassium bicarbonate • Potassium silicate • Reynoutria sachalinensis extract • Rosemary and rosemary oil • Sodium bicarbonate • Trichoderma harzianum

Vertebrate Repellants •

Castor oil

All pest management activity will be contracted out. No storage of pesticides will occur onsite.

Environmental

Traffic

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

Working hours are typically from 30 minutes prior to sunrise and extend for 8 hours. Work may take place 24 hours a day 7 days a week if needed. A cultivation manager will

visit at least once per week. Other contract labor for nutrition and pest control will occur on a weekly basis.

A traffic report is provided with a previous revised project description submittal, which resulted in no peak hour trips.

Waste Management Plan

For solid waste, a large waste bin will be located just outside the fence line to the grow site, near the water tank. Trash pick-up services will be contracted, and the bin will be emptied when it becomes full. For compostable waste, all unused plant materials and soils will be either be shredded and tilled back into the soil after harvest or stored in a compost pile inside the secured area to be composted. During the growing season, compostable waste will be maintained in a pile inside the secured portion of the grow site.

Air Quality

Dust Control

A dust control mitigation agreement is being prepared for the shared access driveway. Dust suppression measures will be applied to this access road. Additionally, the cultivation area will be ripped and disked just after the rainy season to reduce the risk of dust. Onsite roads will also implement dust control measures in compliance with the Air Pollution Control District's CEQA Handbook Section 3.6.3

Water

Water Management Plan

Proposed water supply, use and conservation measures are provided in the project's water management plan prepared by Wallace Group. Wallace Group based their cultivation water use rates based on the Central Coast Regional Water Quality Control Board's cannabis development teams estimates of 0.03 gal/sf canopy/day for outdoor cannabis plants. The project is estimated to consume 1.80 AFY. Estimates are represented in the tables below.

Table 1: Annual Water Demand Estimate for Each Site

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 150 days	588,060	1.80
Total New Water Demand			1.80

Table 2. Estimated Monthly Water Demand for Each Site			
Month	ETo (in)**	Outdoor ETo During Growing Season (%)	Outdoor Cultivation Water Use/Month (AF)
October	3.50	-	-
November	2.02	-	-
December	1.51	-	-
January	1.69	-	-
February	2.24	-	-
March	3.72	-	-
April	4.76	13.5	0.24
May	6.03	17.1	0.31
June	6.56	18.6	0.34
July	6.60	18.8	0.34
August	6.30	17.9	0.32
September	4.94	14.0	0.25
Total	**49.87**	**100%**	**1.80**

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

Biological

A Biological Resources Assessment is provided in accordance with the County of San Luis Obispo Guidelines for Biological Resources Assessments. This report identifies potential adverse impacts to sensitive biological resources and provides recommended avoidance, minimization, and mitigation measures as required to avoid or reduce those impacts.

A San Joaquin Kit Fox Habitat Evaluation Form, including the final score, has been provided.

Gmail

Follow up Meeting 1/24/20 Carizzo Cannabis

Eric Powers <eric.is.powers@gmail.com> Sat, Jan 25, 2020 at 11:21 AM
To: "Bullard, Clint@CALFIRE" <clint.bullard@fire.ca.gov>
Cc: Dan@agzoneservices.com

Hello Bullard,

This email is to document key points of yesterday's meeting.

We will not install hoop houses.
We will not need a perimeter road or either the interior of the fence or the exterior of the fence.
A hammerhead turn around going up to the edge of the cultivation area will be sufficient.
Replace the 9500 gallon water tank with a 5,000 gallon water tank.

Again thank you for your time yesterday.

Eric Powers
Admin Assistant
AGzone Services
805 441 7475

Bullard, Clint@CALFIRE <Clint.Bullard@fire.ca.gov> Sun, Jan 26, 2020 at 7:53 AM
To: Eric Powers <eric.is.powers@gmail.com>

Good morning,

These points provide an accurate accounting of our discussion.

Thank you,

Clinton I. Bullard

Fire Inspector

CAL FIRE/San Luis Obispo County

Prevention 3425

(805)593-3425

From: Eric Powers [mailto:eric.is.powers@gmail.com]
Sent: Saturday, January 25, 2020 11:21 AM
To: Bullard, Clint@CALFIRE <Clint.Bullard@fire.ca.gov>
Cc: Dan@agzoneservices.com
Subject: Follow up Meeting 1/24/20 Carizzo Cannabis

Warning: this message is from an external user and should be treated with caution.

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Eric Powers

Admin Assistant

AGzone Services

805 441 7475

Agzone Services <agzoneservices2019@gmail.com> Sun, Jan 26, 2020 at 4:04 PM
Reply-To: Dan@agzoneservices.com
To: Eric Powers <eric.is.powers@gmail.com>
Cc: "Bullard, Clint@CALFIRE" <clint.bullard@fire.ca.gov>, Dan Tudor <Dan@agzoneservices.com>

Hi Clint Bullard, thank you again for taking the time to meet with Eric Powers and I. We appreciate your working with us to minimize the environmental impact of our cannabis sites while maintaining Cal Fire's high standards of safety.

We'll look forward to seeing you again soon.

Cheers,

Dan Tudor

Founder/Owner
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On Sat, Jan 25, 2020 at 11:21 AM Eric Powers <eric.is.powers@gmail.com> wrote:

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Eric Powers
Admin Assistant
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805 441 7475