

# **TEMPLETON AREA ADVISORY GROUP (TAAG)**

## **Minutes of the Board Meeting**

### **Thursday, February 17, 2022**

Minutes of the meeting submitted by Sonja Bolle.  
This meeting was held via Zoom.

#### **2021-2022 TAAG BOARD MEMBERS**

Bruce Jones, Delegate/Chair  
Murray Powell, Delegate/Treasurer/Vice-Chair  
Erik Gorham, Delegate/Secretary  
Dede Davis, Delegate  
Doris Diel, Delegate  
John Donovan, Delegate  
Scott Shirley, Delegate  
Christine Nelson, First Alternate Delegate

#### **1. CALL TO ORDER**

Chair Bruce Jones called the meeting to order at 5:30 pm.

#### **2. ROLL CALL**

Bruce Jones, chair	present
Murray Powell, treasurer	present
Erik Gorham, secretary	present
Dede Davis, delegate	present
Doris Diel, delegate	present
John Donovan, delegate	present
Scott Shirley, delegate	present
Christine Nelson, alternate	not present

#### **3. AGENCY REPORTS AND UPDATES**

**3.1. Sheriff's Office**  
no report

#### **3.2. California Highway Patrol**

LT. CHANDLER STEWART of Templeton CHP made the report (enroute from Templeton High School, where he is coaching volleyball).

Report refers to period of January 1-31, 2022  
15 crashes investigated: 9 on highway (up 2),  
6 on county roads (up 1)  
Crashes involving property damage: 9  
Crashes involving injury: 3  
DUIs: 3 (down from last year)  
No fatal collisions (2021 showed drop in fatal collisions)  
Total enforcement contacts 60  
(40 on freeway, 20 on county roads)  
Max speed violations: 10 (down from 14 last January),  
with none over 100 mph in this district;  
although max speed violations are up on Hwy 46.  
motorist services: 181 in all of Templeton CHP area, exactly  
same as 2020, after being quieter during pandemic.

Lt Stewart observed that the amount of road construction  
has been a frustration; he noted that bridgework on the overpasses is now  
finished in the area.

Two officers are recently retired. The division is waiting for  
new officers. One or two make a big difference in CHP presence.

DORIS DIEL: Saw on-line comments on Facebook's Templeton  
Crowd group about traffic issues in the Cherry Meadows area (specifically  
Florence St., Honey Way, Eddy St., Old County Rd, Main St.) It's mostly  
concern about teenagers speeding.

LT STEWART: will make sure our information officer keeps track of  
that. We've had similar complaints in the Cambria area. We've seized a  
number of vehicles for road racing. I'm not suggesting your kids are involved  
in that, but we're trying to suppress these issues.

DIEL: We have seen more officers on Las Tablas, thank you.

### **3.3. Supervisorial District One**

no report

### **3.4. Supervisorial District Five**

no report

### **3.5. County Planning Department**

CHERYL KU, SLO Supervising Planner, was present to listen  
in on discussion of cannabis projects under review.

### **3.6. Templeton Community Services District**

DEBORAH LOGAN, president, TCSD, made report:

The TCSD board approved releasing 36 water units. There is a 20% water buffer policy to ensure sufficient water for current and future customers. Assessment reflects current and future water use trends. District achieved 20% buffer, turned up 23 acre feet of unallocated water. We are able to release water units. It's a big deal, indicates the district is moving in the right direction in terms of treating waste water.

Fire Dept: Chief Tom Peterson has applied for a grant to fund 2 engineer positions for 3 years. It's a very competitive process, but he has been able to obtain funding in the past. Keep your fingers crossed.

The board will meet on March 1, fire chief will give his annual report.

There has been an update to the district's sewer code with regard to septic tanks and accessory dwelling units (ADUs), bringing our code into line with state and county regulations.

Regarding the changing rules for public meetings, masks will soon no longer be required indoors for vaccinated attendees. The March 1 meeting will be held via Zoom, but we are moving toward meeting in person. We will continue to offer Zoom attendance, it is convenient and invites public participation.

ERIC GORHAM: At our last meeting, Geoff English was going to get back to me about the weight of Templeton's vote on water issues.

LOGAN: Will get the answer for Gorham via e-mail to Jones.

GORHAM: Signs have been going up announcing that we are in extreme drought conditions, yet we are giving away water?

LOGAN: We are still in drought, which is why we have policies in place. The model takes different areas into account. Treatment of waste water is helping the situation.

GORHAM: Shouldn't the Groundwater Sustainability Agency (GSA) be making that determination?

LOGAN: The integrated water board of SLO County recognizes different levels of severity in different areas.

MURRAY POWELL: I talked to Geoff English some time ago about the TCSD's purchase of equipment for facilitating Zoom conferencing in public meetings. I wonder if that equipment has been ordered, or received? Is it in place for combination in-person and zoom meetings?

LOGAN: The district did install equipment and it has been tested. For the March 1 meeting, two people will be in the board room, the rest by Zoom, to test it all out. The plan is to make Zoom participation available to the public going forward. The technology does require a certain amount of training. Someone has to aim the camera on the person speaking, and the podium, and members of the public on the Zoom screen. Vendor has offered training. In the past, TAAG has used the board room. If TAAG chooses to have meetings in our board room as

you have done in the past, you'd have to designate a person to be trained to operate the equipment.

POWELL: It's a good idea to encourage more public participation. We will touch base with Geoff English.

#### **4. PUBLIC COMMENT**

No comment.

#### **5. CONSENT AGENDA**

##### **5.1 Approval of Minutes from January 20, 2022 TAAG Board meeting**

Motion was made, seconded to approve minutes. Passed by voice vote.

##### **5.2 Approval of Treasurer's Report**

Computer problems prevented treasurer Murray Powell from producing a report. Balance of \$1199 has not changed. There have been no disbursements, however, the treasurer expects Christine Nelson to present a bill in the amount of about \$200 related to setting up web site, and the treasurer will present a bill of \$181 for the annual fee for TAAG's post office box. (This is an increase from last year's \$125.)

BRUCE JONES: The board will postpone a vote on the treasurer's report until the next meeting.

#### **6. OLD BUSINESS - None**

#### **7. NEW BUSINESS**

##### **7.1 JACK CREEK BRIDGE REPLACEMENT—CEQA Document**

A Mitigated Negative Declaration (MND) has been prepared and issued for the County of San Luis Obispo Department of Public Works Jack Creek Road at Paso Robles Creek Bridge Replacement Project. This project is six miles west of the community of Templeton on Jack Creek Road. [HERE](#) you will find the County's Notice of Intent (NOI) to adopt a Negative Declaration pursuant to the California Environmental Quality Act (CEQA) along with the Negative Declaration document for the subject project. The 30-day public review period will begin on February 3, 2022 and will end March 7, 2022.

BRUCE JONES has perused the 76 pages of CEQA report.

MURRAY POWELL: It's an old bridge, in bad repair, it needs to be replaced. TAAG has no comment to make, except that we do not oppose the project.

DORIS DIEL: moved that TAAG not oppose the project.

MURRAY seconded.

MOTION PASSED by voice vote.

## **7.2. TAAG Board Elections**

BRUCE JONES reviewed TAAG Elections Committee recommendations regarding the March 12, 2022 TAAG Board election.

Election to be held Saturday, March 12, 8:30 am to 12:30 pm, during the Templeton Farmers Market, in the Templeton Community Service District Board Room.

All candidates will be seated; the election is for board seats and alternates.

Vicki Janssen (legislative aide to District 1 Supervisor) will provide voter rolls. Voters must be registered in Templeton School District.

Candidates are invited to submit one-page resume and statement, to be posted in public and sent to TAAG e-mail list.

Signs will be posted in the Post Office and other locations to increase public awareness and participation in the election.

There will be a designated area marked "Meet the Candidates Here" separate from the voting area.

No electioneering will be allowed within 200 feet of the voting area.

Science-fair-style booths will be installed for privacy in voting.

Ballots are needed in 2 colors: regular and provisional (necessary, for example, if a name can't be found on voter rolls). Provisional ballots will be verified only if the election is close enough that their number may sway the results.

TAAG members running the election will meet at 7:30 that morning to set up.

DORIS DIEL: Should members of the board not running be on hand?

BRUCE: Yes, it's good to have board members on hand for members of the community to ask questions, meet TAAG, learn about the activities of the group.

MURRAY: The plan is to vote indoors and hope there will be no masking issues by then?

BRUCE: We can adjust if necessary.

**7.3 Review and approval of a TAAG report** to be submitted to the County in response to Notices issued by the SLO County Planning's Notice of Preparation

(attached below) advising that the County has accepted requests from the property owners and applicants of each of the following two cannabis projects to prepare individual project specific Environmental Impact Reports (EIRs). These two proposed Cannabis projects are located adjacent to each other on So. El Pomar Road Templeton.

- City Boy Farms – Project No, DRC2017-00123  
Located at 4225 So. El Pomar Road Templeton
- Eden’s Dream – Project No. DRC2018-00183  
Located at 4339 So. El Pomar Road Templeton

The TAAG report to be reviewed and approved is intended for submission to the various County Boards, commissions, agencies and other interested parties in response to the January 24, 2022 NOP Notice attached below and to a February 10, 2022 County Zoom “joint scoping meeting” that was conducted by the SLO County Planning Department to discuss comments on both projects regarding their proposed EIRs. The Notice of Preparation allows for additional comments and information to be provided to the County by Monday February 24, 2022.

MURRAY POWELL, chair of Cannabis project review committee: There was an informal scoping meeting held to discuss drafting of EIRs relating to 2 projects. Comments must be submitted by Feb 24.

POWELL asked ERIC HUGHES, SLO planner present at the meeting, to explain process for producing EIRs for cannabis projects, which he noted hasn’t been done in this area before.

ERIC HUGHES of SLO County Planning and Building, Cannabis Team, is the county project manager for both projects under review: The county conducted an initial study, received comment, and determined that an EIR would be prepared. EIR is the highest level of analysis under the California Environmental Quality Act (CEQA), undertaken when there is potential for significant impact. As part of that process, the county decided to hold a scoping meeting, which is not normally done for a single project. These two projects have similar issues, and are on adjacent parcels. The purpose of the scoping meeting was to allow the public and public agencies to have input on what should be covered in the scope of the EIR: any mitigation issues, what should county be looking at? Are there alternatives to the project? The scoping meeting is a time for the public to comment and raise concerns – not to determine the merits of the project – not assessing water offset, etc., not making any determinations at this time – just fielding concerns.

County will then ask for bids from consulting firms to draft EIR. These analyses are paid for by the applicants (although over \$200K must be approved by Board of Supervisors/BoS). When county makes Request for Proposal,

consulting firms that work on these EIRs take into consideration the issues raised at scoping meeting. They prepares the draft EIR, which then goes out to public for consideration and comment.

The two separate projects will be analyzed separately.

POWELL: How long is public comment period?

HUGHES: 30 days are required, but typically we allow 45.

POWELL: Can revisions be made based on comments?

HUGHES: If there is new information, or new impacts uncovered that need to be mitigated, there might be recirculation.

POWELL: EIR then goes where?

HUGHES: EIR goes to Planning Commission, which can approve it or send it to BoS for approval.

POWELL: Then where is project approved?

HUGHES: If approved by Planning Commission, they recommend that BoS accept EIR and approve project.

POWELL: how long will this take?

HUGHES: Maybe about a year.

POWELL: Thank you. This is the first time we are going through this on a cannabis project.

POWELL had submitted comments for TAAG to consider as its response to the county.

POWELL's presentation:

City Boy is a fairly large project with indoor and outdoor cultivation. Nursery requires separate permit. They are applying for conditional use permit that will be considered by Planning Commission.

Ordinances specify a 300-foot setback. This project is asking for modification to have setbacks of 100 feet or less. Odor becomes an issue for neighboring properties.

Eden's Dream is located next door. They share a fence line with City Boy. Plans call for indoor and outdoor cultivation with ancillary nursery area. This project does not have the range of activities proposed by City Boy, and requires only a minor use permit. This application goes only through planning dept officer hearing, not planning commission. This project also requests modifications to setbacks, down to 100 feet at west side, adjacent to City Boy.

The TAAG project review committee has reviewed, and recommends disapproval of both projects, on the basis of inability of projects to comply with ordinances.

Scoping meeting on Feb 10 was an informal county meeting, 2 hours by Zoom. I took issue with limiting public comment to 3 mins. They withdrew that limit, appropriately in my view: It should have been an open forum to educate the public.

Eden Farms plans hoop houses, which increase the number of harvests each year. The property lies within the Paso Basin area of severe decline and would

require 2:1 water offset. 35 acres of vineyard and olive trees have been in cultivation on the property for some time. The project proposes to remove olive trees, maybe some vines, and asks for modification of setback.

The City Boy property has no current crop.

Both projects have adjacent residence properties. Cannabis odor is likely to be a problem.

County cannabis ordinances prohibit visibility. Elevation of neighboring properties make fencing ineffective for shielding.

Community compatibility is a problem: Cannabis business is defined by the county as commercial, not agricultural. Argument that it is just another agricultural product does not hold.

There must be consideration of the cumulative effect of other cannabis projects in the area. There is a third proposed cannabis project adjacent to Eden Farms, to the south.

City Boy Farms is a bigger project. In addition to cultivation, it is proposing a manufacturing operation and non-storefront delivery operation, entailing vans and drivers. Estimates 15 full-time employees during the growing season, with an additional 9 during harvest. Hoop house cultivation can generate 3 harvests per year. There is a possibility of up to 35 employees on a 25-acre site.

The county has not determined whether this project is located in the area of severe decline of water basin, which requires 2:1 water-saving offset. Property was originally almond and walnut orchard, many are dead and dying. Not able to offset within site.

ERIC HUGHES: Eden Farms is no longer requesting setback modifications.

It appears the proposed City Boy well lies outside of area of severe decline. You can ask for this to be ascertained in EIR.

EDEN FARMS REPRESENTATIVE: The setback modification has been adjusted. We have redrawn the plan. The other point was the "fair argument standard", we hoped that we could make modifications and garner neighborhood support. An applicant can request an EIR willingly, or the county can require EIR. We requested an EIR, it is an informational document, invites public comment, we'd like to get as comprehensive comments as possible from this committee.

Jason Kallen, representing CITY BOY FARMS: I'd like to correct Murray Powell on the City Boy Farms application. All properties touching the property are agricultural and have some kind of commercial activity taking place. We also elected to request EIR in January of 2021.

KRISTEN GEMENY: Why does Murray Powell's document state that there is inaccurate representation of the project as it is currently proposed?

HUGHES: The project descriptions are posted and meet standards for the county.

MURRAY POWELL moved to submit his comments to SLO county planning dept as TAAG report on issues to be considered in EIR drafting process. (SEE ADDENDUM TO MINUTES.)

SCOTT SHIRLEY: Considering the inaccuracies in the report, e.g., on project design and setback modification, I don't want to second.

(There was a second to the motion.)

ERIC HUGHES: incorrect information is not important at this stage, We just need to know what the public concerns are and include those in instructions for preparing EIR.

JASON KALLEN: Murray Powell is the only person who generated this report, not the committee?

MURRAY POWELL: Correct. It is my own report, not a committee report, but the deadline is Feb 24, so time is short.

SCOTT SHIRLEY: Eric Hughes suggested that the issues raised here tonight, whether they come in a document or not, will be noted in the process, is that correct?

ERIC HUGHES: Yes, there can also be a report from the committee, or from Murray Powell personally. We are soliciting all public input.

DEDE DAVIS: What got my attention in Murray Powell's remarks was 35 parking spaces. It seems like a lot. But these projects are going in all over the county.

KRISTEN GEMENY: They don't need to, that's the point of this discussion.

BRUCE JONES: Murray Powell has a choice, vote on your motion now, or withdraw it and prepare a document for yourself and any co-signers to submit.

(Powell did not withdraw.)

JONES called for roll call vote:

JONES	NO
POWELL	YES
GORHAM	NO
DAVIS	NO
DIEL	YES
DONOVAN	NO
SHIRLEY	NO

Motion did not carry.

7.4 Short discussion of preferences for committee assignments and other TAAG positions after March election.

SCOTT SHIRLEY is willing to be TAAG chair going forward.

BRUCE JONES and SCOTT SHIRLEY will work together on making committee assignments. Board members should submit to chair (JONES or SHIRLEY) their choices for committees. Each member should select at least 2 committees.

Assignments to be discussed at the March meeting.

ERIK GORHAM will step down from board, so TAAG will need a new Zoom Master.

## **8. ANNOUNCEMENTS FROM COMMITTEES**

8.1 Project Review Committee

no report

8.2 Cannabis Project Review Committee

no report

8.3 Community Outreach and Public Relations Committee

no report

8.4 Traffic Circulation Committee

no report

8.5 Bylaws Special Committee

no report

8.6 Water/Toad Creek Committee

no report

8.7 Elections Committee

See earlier discussion of election.

**9. ANNOUNCEMENTS FROM DELEGATES (on items not on the agenda)**

Bruce Jones will be resigning from TAAG at the regularly scheduled March meeting because of potential conflicts in light of his running for Supervisor in District 2.

The alternate elected in March will take Jones' position, and will have to run at the end of his term in 2023.

**10.ADJOURNMENT**

Motion made and seconded to adjourn. Meeting adjourned at 8:08 pm.

ADDENDA to minutes:

NOTICE OF PREPARATION AND SCOPING MEETING DRAFT ENVIRONMENTAL IMPACT REPORT

CANNABIS PROJECT REPORT made by committee chair Murray Powell for TAAG Board to consider as submission to County offering issues to consider in drafting Environmental Impact Report.

**ADDENDUM**

**COUNTY OF SAN LUIS OBISPO  
DEPARTMENT OF PLANNING & BUILDING  
TREVOR KEITH, DIRECTOR**

**NOTICE OF PREPARATION AND SCOPING MEETING  
DRAFT ENVIRONMENTAL IMPACT REPORT**

**DATE:** January 24, 2022

**TO:** Responsible Agencies, Trustee Agencies, and Interested Persons

**FROM:** Eric Hughes, Project Manager  
Department of Planning and Building  
976 Osos St., Room 300  
San Luis Obispo, CA 93408-2040  
[ehughes@co.slo.ca.us](mailto:ehughes@co.slo.ca.us)

**PROJECT:** Eden's Dream, LLC Minor Use Permit DRC2018-00183  
ED19-190 / SCH# 2019099092 APPLICANT: Eden's Dream, LLC

**PURPOSE OF NOTICE**

As the Lead Agency, the County of San Luis Obispo ("County") will prepare an Environmental Impact Report ("EIR") for the above-referenced project and would like feedback from your agencies relating to the scope and content of the environmental information which is germane to your statutory responsibilities. Please consider the fact that your agency will need to use the EIR prepared by the County when considering permits or other approvals for the project.

Due to the time limits mandated by State law, please provide the following information at the earliest possible date, but no later than **5:00 p.m. on Thursday, February 24, 2022.**

1. **NAME OF CONTACT PERSON.** Provide the address, email, and telephone number of the appropriate contact person at your agency.
2. **PERMIT(S) or APPROVAL(S) AUTHORITY.** Provide a summary of the permits or approvals that your agency issues with a copy of the relevant sections of legislation, or regulatory guidance.
3. **ENVIRONMENTAL INFORMATION.** Provide the information or analysis that must be part of the EIR to enable your agency to use this document as a basis for your permits or approvals.

4. PERMIT STIPULATIONS/CONDITIONS. Provide a list and description of standard stipulations or conditions that your agency will apply to features of this project.
5. ALTERNATIVES. Provide a list of alternatives that your agency recommends for analysis in the EIR. 2
6. REASONABLY FORESEEABLE PROJECTS, PROGRAMS or PLANS. Name any future project, programs, or plans that may have an overlapping influence with the project.
7. RELEVANT INFORMATION. Provide electronic references to any documentation that may be useful to the County in preparing the EIR.
8. ADDITIONAL COMMENTS. Provide any additional comments or information that will help the County adequately define the scope the document and determine the appropriate level of environmental assessment.

#### **OTHER CONSIDERATIONS**

In addition to the above referenced project, the County circulated a Notice of Preparation (“NOP”) on December 10, 2021, to prepare an EIR for City Boy Farms Conditional Use Permit DRC2017- 00123 for cannabis activities located on the adjacent parcel to the east. The City Boy Farms NOP can be found at the Office of Planning and Research CEQAnet Web Portal under SCH# 2019089069.

Your agency can include additional input on City Boy Farms as it relates to the scope and content of the environmental information for Eden’s Dream, LLC, and that is germane to your agency’s statutory responsibilities for both projects. Please provide any additional input no later than **5:00 p.m. on Monday, February 24, 2022.**

#### **SCOPING MEETING**

The County will hold a joint scoping meeting to discuss the EIRs that will be prepared for City Boy Farms (DRC2017-00123) and Eden’s Dream, LLC (DRC2018-00183) to give agencies, organizations, interested parties, and the public an opportunity to provide oral comments on the scope and content of both EIRs given the timing, proximity, and similarity of the projects.

The joint scoping meeting will be held virtually on Zoom on **Thursday, February 10, 2022, from 6:00 p.m. to 8:00 p.m.** The Zoom login information is as follows:

Link: <https://us02web.zoom.us/j/81068796160>

Meeting ID: 810 6879 6160

Call in Phone Number: (669) 900-9128

TEMPLETON AREA ADVISORY GROUP (TAAG)  
CANNABIS PROJECT REPORT  
SO. EL POMAR ROAD TEMPLETON PROPOSED PROJECT EIR COUNTY SCOPING MEETING  
CONDUCTED ON FEBRUARY 10, 2022

This report is prepared by TAAG Vice Chair Murray Powell. I am also the Chair of the TAAG CANNABIS PROJECT REVIEW COMMITTEE (CPRC). This report is submitted to the TAAG Board for consideration and approval of comments and recommendations to be submitted to the SLO County Planning Department and other Boards, Commissions, agencies, departments and to the members of the public in response to a January 24, 2022 Notice of Preparation and Scoping Meeting Draft Environmental Impact Report concerning the following two proposed Cannabis projects located adjacent to each other on So. El Pomar Road Templeton. Comments and recommendations must be submitted to the SLO County Planning Department by no later than February 24, 2022. I attended and made comments during this meeting.

- City Boy Farms (DRC2017-00123) 4225 So. El Pomar Road Templeton – Conditional Use Permit Proposed Activities include Outdoor and Indoor Cannabis Cultivation, Commercial Nursery Plant Cultivation and Sales offsite, Cannabis Product Manufacturing and Offsite Cannabis Delivery Services. The project also requests substantial modifications reducing the standard 300 foot minimum setback distances from the project’s property lines DOWN TO 100 FEET or less.
- Eden Dreams (CRC2018-00183) 4339 SO. El Pomar Road Templeton – Minor Use Permit Proposed Activities include Outdoor and Indoor Cannabis Cultivation, with ancillary nursery area permitted by SLO County cannabis ordinances.

Both of these projects have been extensively reviewed by TAAG Cannabis Project Review Committees and full Board Meetings during 2018 through 2020. Processing of both of these project applications have been deferred to later undetermined dates by the County Planning Department due to extensive public and legal opposition to each project. TAAG has recommended disapproval of both projects due to adverse environmental issues and failure to comply with certain SLO County Cannabis ordinances.

The February 10, 2022 Planning Scoping Meeting was conducted through a Zoom meeting process. Public in person attendance was not permitted. This meeting was the initial step in a process for the County to prepare and eventually approve and/or reject draft separate EIR’s for these two projects. The combining of both of these two projects into one scoping meeting was questionable due to substantial differences between the two projects’ proposed cannabis operations.

GENERAL COMMENTS REGARDING HOW THE FEBRUARY 10, 2022 ZOOM SCOPING MEETING WAS CONDUCTED

- The meeting was conducted by several members of the County Planning Department.
- Zoom comments presented by the public were controlled by the Zoom raised hand process and through phone calls that featured a similar raised hand process.
- It was my understanding that this meeting was a more or less informal question and answer process involving the public.
- County Planning Supervisor Steve McMasters announced that public comment was to be limited to 3 minutes for those wished to speak. I protested the arbitrary 3-minute limit on the basis that this was

not a formal County hearing, and therefore the proposed public comment time limit was inappropriate. County Supervisor McMaster's agreed and rescinded his 3-minute public comment limit.

- It was my understanding that this was an open public comment meeting where questions and answers would be allowed and addressed during the full course of the scheduled two-hour meeting. However, requests to respond to County Staff comments for clarification and additional questions raised due to county staff remarks were ignored through the "raised hand" process and additional public comments were not recognized.
- It was and continues to be unclear as to what each project's actual accurate proposed design and description of their operations includes that will form the basis for the draft EIR provisions. The Eden Dreams project has issued revised minor project descriptions and other documents that can be found in the County Planning Citizens Self Service (CSS) website system for this project number. The only significant change I note is the reduction of the project's outdoor cannabis cultivation area from 3.0 acres to 2.63 acres. However, there is no evidence that this documentation has been determined to represent the documents that will be considered during the project's EIR drafting process.

Similar issues exist concerning the City Boy Farms project. Existing documentation for this project appears to consist of the original application documentation that resulted in the continuance of scheduled County Planning Commission hearings to undetermined dates due to extensive public and legal opposition to the project. I have been advised by a County Planner involved with this project that "minor" changes to this project's operations have been proposed by the project applicant but NO REVISED INFORMATION HAS BEEN MADE AVAILABLE FOR PUBLIC REVIEW as of this date to my knowledge.

Briefly the following issues appear to continue to support TAAG'S opposition to these projects:

#### EDEN FARMS

- There are no proposed Outdoor Cannabis odor mitigation systems proposed to ensure that odor is not detected offsite. The project proposes 2.63 acres of outdoor cannabis cultivation area in hoop houses. County cannabis ordinances prohibit detection of cannabis odor offsite.
- The project requests an outdoor cannabis setback modification reducing the County's standard 300-foot setback distance from the project's property lines down to 100 feet from the western property line. This modification significantly increases the possibility of odor detection offsite.
- This project proposes the use of cannabis hoop house outdoor cultivation activity. According to the project's recently revised Water Use analysis, hoop house cultivation expects to develop three (3) mature cannabis harvests each growing season between April and October. Cannabis odor production is the highest during the flowering and harvesting stages of cannabis cultivation. High odor production is expected to occur during the 30 to 45 days' maturation period prior to harvesting. In this case a minimum of 90 to 135 days of peak odor production will be experienced in the general area of the project during its seven- to eight-month annual outdoor cultivation season.
- The east side property lines of this project share an adjacent rural residential area consisting of approximately 20 residential properties. The experience with outdoor cannabis cultivation operations in SLO County, SB County and other areas of California and other states has proven beyond a reasonable doubt that cannabis odor mitigation will, depending on weather and wind conditions, substantially impact neighboring properties.
- The project appears to be located in a Paso Robles Basin Area of Severe Decline that requires a Basin water use savings amount ratio of 2:1. This project's current estimated cannabis water use is

approximately 9 acre-feet per year assuming hoop house outdoor cultivation. This project property currently cultivates grape vineyards and some olive tree area that would be removed in order to meet the required 2:1 Basin water use offset. It is unclear whether removal of existing County recognized crops such as vineyards and olive trees qualify this Commercial Cannabis project for onsite 2:1 Paso Basin water use offsets.

- The project violates the SLO County cannabis ordinance that prohibits visibility of cannabis plants from offsite properties. Several adjacent properties have clear unobstructed views of the proposed outdoor cannabis cultivation areas. Due to the elevation of certain neighboring properties, the blocking or obstruction of views of the cultivation areas are not possible.
- Community and neighborhood compatibility: Cannabis projects are defined by SLO County as “Commercial” not “Agricultural” properties. There are no known similar cannabis projects in the general area.
- Cumulative effect of the project on the community and the County: This project is one of three proposed adjacent cannabis projects in the So. El Pomar Road area. One RESIDENTIAL AG PROPERTY is surrounded on three sides by these three projects. California CEQA law requires that the County consider the environmental effects of this and each project in conjunction with other existing proposed projects in the area and in the County.

#### CITY BOY FARMS (DRC2018-00123)

- This project was the first cannabis project submitted to TAAG for review in January 2018.
- The project proposes both outdoor and indoor cannabis cultivation areas, a commercial outdoor cannabis nursery operation for sale to others, a cannabis product manufacturing operation and a non-store-front dispensary operation for delivery of product offsite.
- The applicant estimates that 15 employees will be required full time during the outdoor growing season. 9 additional employees will be required during harvest periods (undefined). The Manufacturing operation will require 4 additional employees full time. The Dispensary delivery operation may require up to 3 employees when fully operational. This brings the total number of employees on site including 9 harvest workers to 32 employees.
- The project is a 25.59 acre property site that proposes 3 acres of outdoor mature cannabis cultivation area in hoop houses and approximately 3 acres of outdoor cultivation commercial nursery plants for sale to others. The project also proposes an extremely minimal “outdoor odor mitigation system” that only covers a very small (undefined) portion of the project’s northern property line. Reviews of the project property site plans have determined that the proposed odor mitigation system will not prevent odor from detection offsite. County cannabis ordinances prohibit detection of cannabis odor offsite.
- The project requests outdoor cannabis setback modifications reducing the County’s standard 300-foot setback distance from the project’s property lines down to 100 feet or less from various project property line areas. These modifications significantly increase the likelihood of odor offsite detection.
- This project proposes the use of cannabis hoop house outdoor cultivation activity. As discussed in the Eden Dream’s section above, outdoor hoop house cultivation expects to develop three (3) mature cannabis harvests each growing season between April and October. Cannabis odor production is the highest during the flowering and harvesting stages of cannabis cultivation. High odor production is expected to occur during the 30 to 45 days’ maturation period prior to harvesting of mature cannabis plants. In this case a minimum of 90 to 135 days of peak odor production will be experienced in the general area of the project during its seven- to eight-month annual outdoor cultivation season.
- The project applicant claims that outdoor hoop houses will mitigate outdoor odor. Hoop houses are classified as outdoor cultivation. SLO County cannabis and other ordinances prohibit any installation of electrical or irrigation systems and prohibit the use of any indoor type of odor mitigation systems or

equipment. Hoop house structures are temporary structures that require venting odor-laden air directly to the exterior environment.

- All property lines of this project share adjacent AG ZONED residential property lines. The experience with outdoor cannabis cultivation operations in SLO County, SB County and other areas of California and other states has proven beyond a reasonable doubt that cannabis odor mitigation will, depending on weather and wind conditions, substantially impact neighboring properties.
- The project originally was entirely located within the Paso Basin Area of Severe Decline that requires a 2:1 Ratio Basin water use savings offset. It currently appears that, due to the recent adjustments of the Basin's designated areas of Severe Decline, the project property is currently partially within a Severe Decline area. We have been advised by the County that the application of the 2:1 offset ratio has not been determined as of this date.
- This project's current estimated cannabis water use is approximately 7.29 acre-feet per year. Assuming hoop house outdoor cultivation, it does not appear that provisions for increased outdoor hoop house cultivation water use have been considered in this water use estimate. This project property has no irrigated regular crop activities currently conducted on the property. The site was originally a decades old almond and walnut orchard farm that has not conducted any sort of irrigated crop activities for at least ten or more years. Currently existing trees appear dead or dying, and no crop production has been seen for many years. This project site is unable to generate any onsite irrigated water use offsets required by SLO County cannabis ordinances.
- The project violates the SLO County cannabis ordinance that prohibits visibility of cannabis plants from offsite properties. Several adjacent properties have clear unobstructed views of the proposed outdoor cannabis cultivation areas. Preventing or obstructing cannabis plant visibility from neighboring sites is not possible due to the elevation of certain neighboring properties. This is a violation of County cannabis ordinances.
- The proposed Manufacturing operation raises questions concerning employee, fire and other safety considerations.
- Community and neighborhood compatibility: Cannabis projects are defined by SLO County as "Commercial" not "Agricultural" activities. There are no known similar cannabis projects in the general area.
- Cumulative effect of the project on the community and the County: This project is one of three proposed adjacent cannabis projects in the So. El Pomar Road area. One RESIDENTIAL AG PROPERTY is surrounded on three sides by these three projects. California CEQA law requires that the County consider the environmental effects of this and each project in conjunction with other existing proposed projects in the area and in the County.

Submitted for consideration,

Murray Powell  
TAAG Vice-Chair