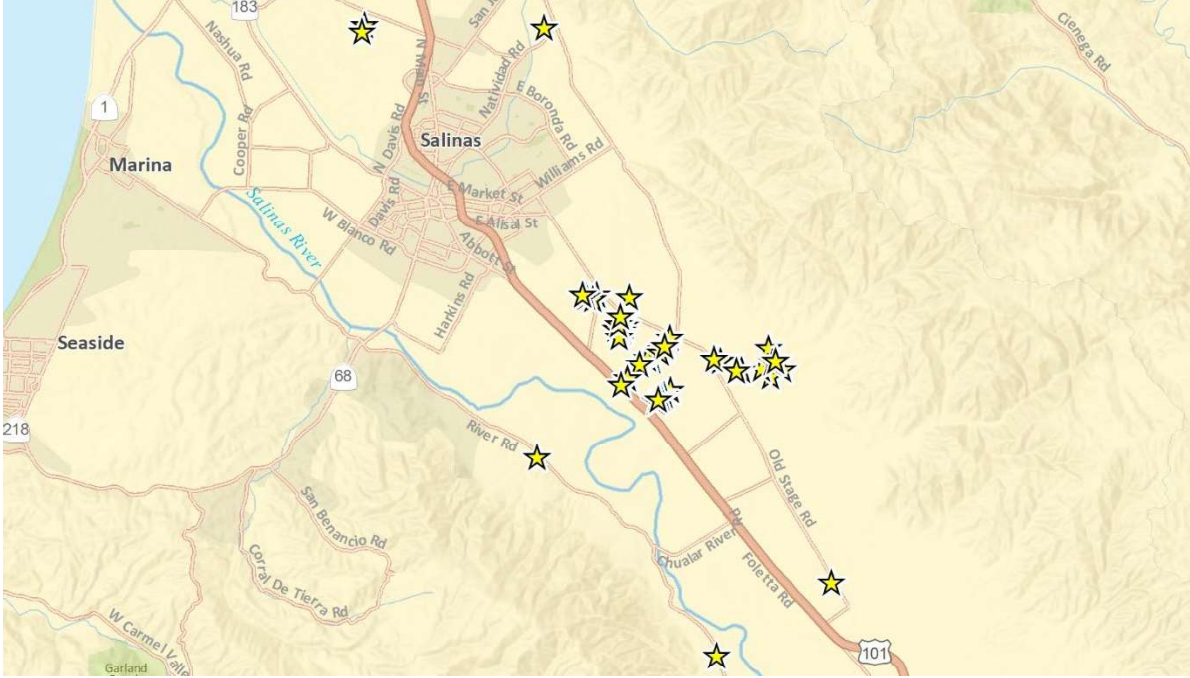


# Attachment C

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## Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County

### Response to Comments on Draft IS-MND

*prepared by*

**County of Monterey**

Resource Management Agency

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*prepared with the assistance of*

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**October 2020**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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# Responses to Comments on the IS-MND

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This section includes comments received during the circulation of the Initial Study-Mitigated Negative Declaration (IS-MND) prepared for the Multiple Cannabis Cultivation Facilities Project (project).

The IS-MND was circulated for a 30-day public review period that began on June 15, 2020 and ended on July 17, 2020. The County of Monterey received three comment letters on the IS-MND. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter	Page No.
1 Lindsay Rains, Licensing Program Manager, California Department of Food & Agriculture	2
2 Chris Bjornstad, Associate Transportation Planner, Department of Transportation	31
3 Hanna Muegge, Air Quality Planner, Monterey Bay Air Resources District	33

The comment letters and responses follow. The comment letters have been numbered sequentially (preceding a decimal) and each separate issue raised by the commenter, if more than one, has been assigned a number following a decimal. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Additionally, a Master Response is provided below, which is referenced in individual responses, where more than one comment makes the same general statement of concern.

## Master Response

**Comment:** Commenters request more site-specific information be included in the CEQA document cited in applications for annual licenses, including a description of site-specific modifications and environmental impacts.

**Response:** The County has prepared a checklist to accompany commercial cannabis project applications for permits and approvals on the 45 project sites, which includes requested details (refer to Appendix C). This checklist will be considered during site-specific planning approvals and will be required for inclusion in each application to CDFA for state cultivation licenses. The checklist will provide the reasoning for concluding that the proposed activity fits within the programmatic IS-MND analysis. If it does not fit, a site-specific IS-MND Addendum will be prepared.

The checklist includes the request for information specific to a project's or project site's water usage, energy usage, number of employees, number of truck trips, and nearest sensitive receptor.

Potential impacts to air quality, biological resources, energy, GHG emissions, hydrology (including groundwater recharge), transportation, and utilities (including groundwater supplies and wastewater systems) are addressed in Sections IV.3, IV.4, IV.6, IV.8, IV.10, IV.17, and IV.19, respectively, of the IS-MND. The assessment provided in the analysis sections of the IS-MND include development on each project site, as described in the Project Description of the IS-MND. Impacts for these issue areas for each of the 45 sites was accounted for in the IS-MND, and further analysis of individual projects is not required, unless the proposed development on an individual site increases beyond the assumptions of the IS-MND.



July 03, 2020

Craig Spencer  
Monterey County RMA – Planning Division  
1441 Shilling PI South 2<sup>nd</sup> Floor  
Salinas, CA 93901  
email: spencerc@co.monterey.ca.us

Re: Review of Initial Study/Mitigated Negative Declaration (SCH#2020060325)  
Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County

Dear Mr. Spencer:

Thank you for providing the California Department of Food and Agriculture (CDFA) CalCannabis Cultivation Licensing Division (CalCannabis) the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) (SCH#2020060325) prepared by the County of Monterey for the proposed Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County (Proposed Project).

CDFA has jurisdiction over the issuance of licenses to cultivate, propagate and process commercial cannabis in California. CDFA issues licenses to outdoor, indoor, and mixed-light cannabis cultivators, cannabis nurseries and cannabis processor facilities, where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012, subd. (a)(2).) All commercial cannabis cultivation operations within California require a cultivation license from CDFA.

CDFA certified a Programmatic Environmental Impact Report (PEIR) for its cannabis licensing activities on November 13, 2017. The PEIR provided an evaluation at a statewide level of the types of impacts expected to be caused by cannabis cultivation, including the cumulative impacts that would be expected under the CalCannabis Cultivation Licensing Program.

### **CEQA Requirements for Annual State Cultivation License Applicants**

Pursuant to state regulations, CDFA requires an annual license applicant to provide evidence of exemption from, or compliance with, California Environmental Quality Act (CEQA) (Cal. Code of Regs., tit.3 § 8102(r)). The evidence provided must be one of the following:

1.1



1.1  
cont.

- (1) A signed copy of a project-specific Notice of Determination or Notice of Exemption and a copy of the associated CEQA document, or reference to where it may be located electronically, a project description, and/or any accompanying permitting documentation from the local jurisdiction used for review in determining site specific environmental compliance;
- (2) If an applicant does not have the evidence specified in subsection (1), or if the local jurisdiction did not prepare a CEQA document, the applicant will be responsible for the preparation of an environmental document in compliance with CEQA that can be approved or certified by [CDFA], unless [CDFA] specifies otherwise.

When the project has been evaluated in a site-specific environmental document previously certified or adopted by the local Lead Agency, CDFa will evaluate the project as a Responsible Agency, as provided in Section 15096 of the CEQA Guidelines. When the local jurisdiction prepares a Notice of Exemption (NOE) for a categorical exemption, CDFa will act as the CEQA Lead Agency and conduct an independent verification, as provided in Section 15300 et. seq. of the CEQA Guidelines, as to whether the exemption is appropriate for its purposes.

For a complete list of all license requirements please visit: [static.cdfa.ca.gov/MCCP/document/CDFa Final Regulation Text 01162019 Clean.pdf](http://static.cdfa.ca.gov/MCCP/document/CDFa%20Final%20Regulation%20Text%2001162019%20Clean.pdf).

### **General Comments (GCs) on the IS/MND**

CDFa offers the following general comments concerning the IS/MND.

#### ***GC1. Proposed Project Description***

Several of the specific comments in the table below relate to the lack of detail provided in the Proposed Project description, particularly Proposed Project operations.

1.2

The IS/MND would be improved if it consistently described existing conditions and operations at all of the 45 greenhouses it intends to include as part of the Proposed Project. The document indicates that 31 of the sites are currently cultivating cannabis; however, it does not provide details on how long each existing site has cultivated cannabis or the extent of the existing canopy. Providing a clear and detailed description of existing operations allows CDFa the ability to compare new proposed operations to those that have already been established to determine what changes may occur as a result of the Proposed Project. For the other 14 sites, the IS/MND provides inconsistent descriptions of current operations. It is not clear which and how many of the sites are currently operational, nor the extent or specific type(s) of current operations (e.g., cut flowers, herbs, spices, or vegetables). The IS/MND would also be strengthened if it described how many and which greenhouses have no existing operations, and for how long these sites have been non-operational.



1.2  
cont.

In addition, the document would be improved if it provided more detail about the nature and scale of the site improvements that will be required for the Proposed Project. The document indicates that some sites will require site and infrastructure improvements, such as well replacements, water treatment facilities, septic tanks, roadway and parking improvements, and electric upgrades. However, without a description of the number or extent of such improvements, it is difficult to discern the extent of any potential resource impacts.

Note that because of CDFA's requirements for site-specific CEQA compliance, CDFA will require site-specific descriptions of existing conditions as well as details regarding proposed improvements and operations in order to issue an annual license (See GC 2).

**GC2. Requirement for Site-Specific CEQA Compliance**

1.3

The County's IS/MND does not specify how the County intends to comply with CEQA for individual cannabis cultivation projects that would fall under this "programmatic initial study." While the document provides certain general information about each of the sites, it does not provide a site-specific environmental analysis of the potential impacts of any of the 45 projects discussed in the document.

Instead of describing particular impacts of any specific project, the document instead makes general statements or lists of what some of the 45 projects might include and draws conclusions about whether impacts might occur from these possible developments. As an example, on page 10, the IS/MND states that proposed site improvements would include "water distribution/conveyance systems for domestic use, drip irrigation, washing for packaging facilities and manufacturing equipment, water treatment facilities, new wells, storage tanks for domestic/emergency/fire suppression water, and permanent bathroom facilities for operational employees." However, there is no description of which projects would require each type of site improvement. Without this specific information, CDFA would not be able to assess the impacts of any particular project.

1.4

A project-specific CEQA document, as required by Section 8102(r)(1), would include disclosure of existing uses of the proposed project site, including existing water and energy usage, number of employees and vehicle trips. Then, a site-specific analysis of the potential impacts of any proposed new uses would include an analysis of the potential environmental impacts of each individual project as compared to existing uses. Additionally, the project-specific document would include an analysis of the cumulative impacts of all 45 projects and any additional proposed projects in Monterey County. Several comments below relate to the project-specific information CDFA will require in order to process annual license applications for the 45 individual projects.

Note that CDFA cannot issue annual licenses for projects with ministerial approval absent a site-specific CEQA analysis. For projects approved by ministerial action, CDFA may issue provisional licenses only if the County provides evidence that site-specific CEQA compliance is underway (Bus. & Prof. Code § 26050.2).

**GC3. CEQA Streamlining**

CDFA encourages local jurisdictions to use CEQA streamlining options, when appropriate, including the use of a programmatic CEQA document to cover CEQA review for later activities. If Monterey County intends to rely on the IS/MND for site-specific CEQA compliance for later activities, CDFA recommends that the County prepare Notices of Determination (NODs) and file them with the State Clearinghouse for activities approved in this manner.

Section 15168(c)(4) of the CEQA Guidelines recommends that:

1.5

Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

If the County intends to rely on the IS/MND for site-specific CEQA compliance for site-specific cultivation projects, CDFA requests the County prepare a checklist for each subsequent activity, pursuant to Section 15168(c)(4), and provide copies to applicants, for inclusion with their applications to CDFA for state cultivation licenses. This would provide the documentation needed by CDFA of the County's reasoning in concluding that the proposed activity fits within the analysis covered by the County's programmatic IS/MND and that subsequent environmental review is not required.

**GC4. Categorical Exemptions**

When site-specific cultivation projects are determined by the County to be categorically exempt from CEQA, CDFA recommends that the County use one of the following options available for cultivation projects to document the County's determination:

1.6

- Complete an NOE for any projects where it can be demonstrated that the project would not have the potential for a significant effect on the environment (General Rule Exemption, CEQA Guidelines § 15061(b)(3)); or
- Complete an NOE for any projects qualifying for one or more classes of categorical exemption (CEQA Guidelines § 15300 et. seq.).

CDFA recommends that, in addition to notice-filing requirements under Public Resources Code section 21152 and CEQA Guidelines section 15062, local Lead Agencies file a copy of a NOE with the State Clearinghouse. CDFA further recommends that local Lead Agencies provide a copy of the signed and dated NOE, and evidence of posting if completed, to cultivation applicants so that applicants may provide this evidence to CDFA as part of their license application packages.

**CG5. Environmental Baseline**

1.7

The IS/MND for the Proposed Project indicates that the baseline for “most issues” is the existing condition; however, the document relies on a different baseline for five issue areas: air quality, energy, greenhouse gas emissions, transportation, and water supply. For these five areas, the IS/MND uses a baseline of historical agricultural production, excluding cannabis, which is described as “primarily cut flowers.” The IS/MND indicates that this baseline was chosen because it is the “most consistent baseline for evaluating energy demand, greenhouse gas emissions, vehicle trips, and water demand associated with all greenhouse project sites.”

A site-specific CEQA analysis, as required by CDFA for its purposes of issuing an annual license, would require the County to define the baseline for that particular project, rather than a standard baseline chosen for the purpose of consistency with other projects. As an example, the project description indicates that 14 of the sites are not currently operational (p.9). If a greenhouse historically operated a cut flower operation, but has been abandoned for a number of years prior to a proposed cannabis cultivation operation, the cut flower operation may not provide an appropriate baseline. As noted in General Comment 2, the environmental setting for each project would need to be described, and then the document should provide an analysis of the impacts of that particular project as compared to existing uses.

**GC 6: Impact Analysis**

1.8

Several comments provided in the Specific Comments table below relate to the absence of information or analysis to support impact statements in the document. CEQA requires that Lead Agencies evaluate the environmental impacts of proposed projects and support factual conclusions with substantial evidence, including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. (CEQA Guidelines, § 15384(b).) This may include logical arguments, evidence from technical studies, evidence from local knowledge, and information from other expert sources. In general, the IS/MND should provide evidence to support the impact statements in for each question in the checklist, including references for the sources of information relied upon to make conclusions.

**Specific Comments and Recommendations**

In addition to the general comments provided above, CDFA provides the following specific comments regarding the analysis in the IS/MND.

Letter 1

1.9

<b>Comment No.</b>	<b>Section Nos.</b>	<b>Page No(s).</b>	<b>Resource Topic(s)</b>	<b>IS/MND Text</b>	<b>CDFA Comments and Recommendations</b>
1	II(A)	10	Project Description (Proposed Site Improvements)	Conversion of the existing greenhouses would require infrastructure improvements to provide for the cultivation and processing needs of the cannabis plants.	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all infrastructure improvements that are proposed for that specific project, and analyses the impacts of such improvements.
2	II(A)	10	Project Description (Proposed Site Improvements)	Proposed site improvements would also provide operational facilities including: water distribution/conveyance systems for domestic use, drip irrigation, washing for packaging facilities and manufacturing equipment, water treatment facilities, new wells, storage tanks for domestic/emergency/fire suppression water, and permanent bathroom facilities for operational employees.	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all infrastructure improvements that are proposed for that specific project, and analyses the impacts of such improvements.
3	II(A)	10	Project Description (Proposed Site Improvements)	Development of the project sites for cannabis cultivation may also include the	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all infrastructure improvements that are

Letter 1

1.9  
cont.

1.10

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
				<p>establishment of a new public water system, if it is determined that Monterey County's threshold for requiring a water system would be met due to the number of operational employees present on a given project site...</p>	<p>proposed for that specific project, and analyses the impacts of such improvements.</p>
4	II(A)	10-11	Project Description (Operations)	<p>The cultivation stage for cannabis requires minimal staffing.</p> <p>The existing 45 project sites collectively have an average total of 780 employees for regular operations (average of about 17 employees per site), which grows by 159 employees seasonally, to 939.</p>	<p>The IS/MND's description of the 939 employees required to operate the cultivation facilities does not seem consistent with the description of the staffing needs as "minimal." Also, the document would be improved if it described both the number of employees that currently work at the project sites, as well as the number of employees that would be projected to work at the sites once the Proposed Project is fully operational. In addition, the document would be improved if it described the sources or support for its quantification of both regular and seasonal employees at the proposed sites.</p> <p>Note that when applying for an annual license, applicants will need to submit a site-specific CEQA document that</p>

Letter 1

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
1.10 cont.					describes the numbers of regular and seasonal employees that are projected to work at that specific project, and analyze the impacts of those employees on resource topics, such as traffic and transportation and associated air quality.
1.11	II(A)	11	Project Description (Operations)	The manufacturing stage of production requires 40-60 seasonal staff members. Plants are processed by cutting, trimming, and drying.	<p>Cutting, trimming, and drying of cannabis, as described in this section, are typically associated with cannabis processing activities. "Manufacturing" activities generally refer to the manufacturing of non-flower cannabis products such as edibles, tinctures and oils. The IS/MND would be improved if it clarified this language.</p> <p>Additionally, the document would be improved if it indicated whether the 40-60 seasonal staff members would be required for each site or across the 45 sites, and provided support for its quantification of employees at the proposed sites.</p>
1.12	II(A)	11	Project Description (Operations)	The average number of daily truck trips generated by the project sites is approximately 30 trips per day and approximately 78 truck trips per week for delivery of materials or	The IS/MND would be improved if it explained how an average of 30 truck trips per day would result in an average of 78 truck trips per week, assuming a five-day work week. In addition, the document would be improved if it indicated whether the 30 trips per day and 78 trips per week would be required

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1.12	Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
cont.					supplies and shipment of product.	for each site or across the 45 sites, and provided sources or support for the quantification of truck trips.
1.13	7	II(A)	11	Project Description (Utilities)	<p>Operational power of the proposed cannabis facilities would be provided by Pacific Gas &amp; Electric (PG&amp;E). Each site has access to PG&amp;E electrical and natural gas lines.</p> <p>Generators located at various sites provide backup power production during the winter months when additional light and heat are needed for plant cultivation.</p>	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all energy sources that are proposed for that specific project, and analyzes the impacts related to energy, GHGs, and utilities.
1.14	8	II(A)	14	Project Description (Water)	<p>Water supply for irrigation, processing, and domestic use would be provided by on-site or shared wells.</p> <p>A few project sites are connected to existing public water systems...</p>	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all water sources that are proposed for that specific project and any infrastructure that will be required prior to use of the proposed water source. Then the site-specific CEQA document will need to provide an analysis of the impacts of the project related to resource topics, such as biological

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1.14  
cont.

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
				<p>Other sites not connecting to an existing water system may require the establishment of a new small water system or public water system with Monterey County...</p> <p>Several of the sites have water sources (within the Salinas Valley Groundwater Basin) that [...] would require on-site treatment prior to use for cannabis cultivation. The treatment systems would generate waste, which would require offsite disposal or approval/wastewater discharge permit for onsite disposal from the Central Coast RWQCB...</p>	resources, hydrology, energy, and utilities.
9	II(A)	14	Project Description (Water)	Well restoration, maintenance, and installation may be included for various sites, where applicants	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all water sources that are proposed for that specific project and any



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Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
1.14 cont.				have explored available connections through an existing permitted water system within three miles of the project site and no such system is available.	infrastructure that will be required prior to use of the proposed water source. Then the site-specific CEQA document will need to provide an analysis of the impacts of the project related to resource topics, such as biological resources, hydrology, energy, and utilities.
1.15	II(A)	15	Project Description (Site Access)	Roadway, fencing, and parking improvements may be constructed at some sites. Parking improvements would include formalization of existing parking areas and potentially creation of additional parking; however, parking areas are not anticipated to be paved.	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all roadway, fencing, and parking improvements. Then the site-specific CEQA document will need to provide an analysis of the impacts of the project related to resource topics, such as biological resources and transportation.
1.16	II(A)	15	Project Description (Environmental Setting)	Thirty-one of the sites are currently operational with licensed commercial cannabis cultivation, manufacturing, and distribution. The remaining eight facilities are not currently operational with licensed commercial	The IS/MND indicates that there are 45 total sites that are the subject of the document. The environmental setting describes 31 sites as currently operating as cannabis businesses, and an additional eight sites currently operating for other agricultural uses. The IS/MND would be improved if it described the current status of the remaining six sites.

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1.16  
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1.17

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
				cannabis, although they are in the process of obtaining licenses. Currently, these remaining eight facilities are operational for floral, spice, herb, and vegetable production.	
12	II(A)	16	Project Description (Analysis Baseline)	Thirty-one (31) of the greenhouse project sites are currently cultivating cannabis. Three sites have been cultivating cannabis since 2005. Seven of the project sites have been cultivating cannabis since 2015 when the Medical Cannabis Regulation and Safety Act (MCRSA) was passed in California. One site has been cultivating cannabis since 2017 when MAUCRSA was passed. Fourteen sites (14) have not been previously cultivating cannabis.	<p>The IS/MND indicates that there are 45 total sites that are the subject of the document. The analysis baseline section describes 31 sites as currently operating as cannabis businesses. Of these, it describes the time frames for 11 of the sites, but does not indicate the history or status of the remaining 20.</p> <p>In addition, the document indicates that 14 of the sites have not previously been used for cannabis businesses. The IS/MND would be improved if it described the status of all facilities that are the subject of the Proposed Project.</p>

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	<b>Comment No.</b>	<b>Section Nos.</b>	<b>Page No(s).</b>	<b>Resource Topic(s)</b>	<b>IS/MND Text</b>	<b>CDFA Comments and Recommendations</b>
1.18	13	II(B)	16	Project Description	Other Public Agencies whose Approval May be Required	The document would be improved if the City revised the IS/MND to list all agencies requiring approval of the Proposed Project, including any local permits for well installation, building, or grading, the Central Coast RWQCB, and the State Water Resources Control Board (SWRCB), as applicable. The IS/MND would also be more informative if the permit required from each agency was listed (e.g., cultivation license from CDFA, Lake and Streambed Alteration Agreement from CDFW, proof of enrollment in or exemption from either the SWRCB or RWQCB program for water quality protection) and whether these have been obtained.
1.19	14	IV(A)	21	Findings (Public Services)	N/A (General Resource Comment)	The document would be strengthened if it provided an analysis of whether and how cannabis cultivation operations may contribute to the risk of structural fires or wildfires and whether those risks may contribute to impacts on public services.
1.20	15	IV(A)	21	Findings (Public Services)	The project would not result in significant additional demand for police protection services since the project does not include new residential or	The document would be strengthened if it provided an analysis of whether and how cannabis cultivation operations may differ from other types of agricultural operations or residential or commercial development due to the high value of the crop, and whether those differences may contribute to impacts on public services.

Letter 1

1.20 cont.	Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
1.21	16	VI(3)(a)	37	Air Quality	commercial development. Given the project s.f. listed in Table 3, the project is estimated to have approximately 14,521 employees.	The estimate of 14,521 employees that would be employed by the Proposed Project conflicts with the estimate of 939 employees provided in the project description. The document would be improved if the figures were consistent and the analysis was predicated on the correct figure.
1.22	17	VI(3)(c)	38	Air Quality	Due to the rural and agricultural nature of the project sites, the only type of sensitive receptor near the sites are single-family residential homes located on agricultural properties.	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes all sensitive receptors near the site and provides an analysis of impacts on those sensitive receptors.
1.23	18	VI(3)(d)	40	Air Quality	[T]he facilities must provide a contact that the public can reach to provide notice of issues with the cannabis operation, including odors.	The IS/MND would be improved if it described the legal and regulatory requirements that would support the County's actions to ensure significant impacts due to odor would not result from the Proposed Project and provided an analysis of whether these measures would be sufficient.
1.24	19	VI(10)(b)	67	Hydrology and Water Quality	[F]our project sites (33, 34, 42, and 44) are located within the 180/400 Foot Aquifer.	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes the water use at the site and provides a

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Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
				The 180/400 Foot Aquifer is identified by Department of Water Resources (DWR) as critically overdrafted...	site-specific analysis of whether the project will substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, or whether the project will make a cumulatively considerable contribution to such impacts.
20	VI(10)(b)	67	Hydrology and Water Quality	N/A (General Resource Comment)	The document describes four “scenarios” for comparing current water use to the Proposed Project’s water use; however, none of the scenarios matches the description of current operations in the project description on page 15. The IS/MND would be improved if it described current conditions at the Proposed Project sites and compared it to projected use.
21	VI(10)(e)	68	Hydrology and Water Quality	The proposed project is located primarily within the East Side Aquifer Subbasin, with two project sites located within the 180/400 Foot Aquifer Subbasin which is managed per the direction of a GSP adopted by the Salinas Valley Groundwater	The description of aquifers on which the project sites are located conflicts with the description on page 67, which states that four sites are located within the 180/400 Foot Aquifer Subbasin. The document would be improved if the descriptions were consistent.

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1.26 cont.	Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	IS/MND Text	CDFA Comments and Recommendations
					Basin GSA on January 9, 2020.	
1.27	22	VI(18)	84	Tribal Cultural Resources	N/A (General Resource Comment)	The IS/MND would be improved if it listed all Tribes that were contacted regarding the Proposed Project, the date on which contact was made, and any additional Tribes that responded to the AB52 notice.
1.28	23	VI(19)(a)	87	Utilities and Service Systems	[I]f it is determined over time that the number of operational employees on a given project site may require new or expanded OWTS/septic systems, site-specific re-evaluation by a Qualified Professional may be required and expansion of existing OWTS may occur, with the approval of the Monterey County Environmental Health Bureau (EHB).	When applying for an annual license, applicants will need to submit a site-specific CEQA document that describes whether new or expanded on-site wastewater treatment systems or septic systems will be required at the site and provides a site-specific analysis of any impacts of such systems.
1.29	24	VI(19)(a)	88	Utilities and Service Systems	Based on the above discussion, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment,	This conclusion appears to contradict the text within this section that indicates that relocation or construction of new and expanded water, wastewater treatment, and electric power facilities may be required at certain sites. The

Letter 1

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cont.

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<b>Comment No.</b>	<b>Section Nos.</b>	<b>Page No(s).</b>	<b>Resource Topic(s)</b>	<b>IS/MND Text</b>	<b>CDFA Comments and Recommendations</b>
				storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	document would be improved if the descriptions were consistent.  In addition, when applying for an annual license, applicants will need to submit a site-specific CEQA document that describes whether new or expanded water, wastewater, electric, or other infrastructure will be required at the site and provides a site-specific analysis of any impacts of such systems
25	VII	93-94	Mandatory Findings of Significance	N/A (General Comment)	The IS/MND would be more informative if it listed the mitigation measures it refers to. The measures need not be repeated in full; but may provide a listing by number.
26	VII(b)	93-93	Mandatory Findings of Significance	N/A (General Comment)	The IS/MND would be more informative if it identified any other cannabis growing operations that exist or have been proposed in the vicinity of the Proposed Project, and whether the proposed project would make a considerable contribution to any cumulative impacts from these other projects.

**Conclusion**

1.31  
cont. CDFA appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist Supervisor, at (916) 576-4161 or via e-mail at [kevin.ponce@cdfa.ca.gov](mailto:kevin.ponce@cdfa.ca.gov).

Sincerely,

**Lindsay Rains** Digitally signed by Lindsay Rains  
Date: 2020.07.03 13:23:21 -07'00'

Lindsay Rains  
Licensing Program Manager



## Letter 1

**COMMENTER:** Lindsay Rains, Licensing Program Manager, California Department of Food & Agriculture (CDFA)

**DATE:** July 3, 2020

### Response 1.1

**Comment:** The commenter states that CDFA has jurisdiction over issuing commercial cannabis licenses in California, which has been covered in a Programmatic EIR for the CalCannabis Cultivation Licensing Program. The commenter states that CDFA requires annual licensing to provide evidence of exemption from or compliance with CEQA.

**Response:** Comment noted. CDFA is listed as an approval agency in Section II(B) of the IS-MND.

### Response 1.2

**Comment:** The commenter states that existing conditions and operations are not described consistently, and requests details on how long existing sites have cultivated cannabis for, the extent of the canopy, current operations details (including specific operation types), and how long sites have been non-operational for (as applicable). The commenter also requests the nature and scale of site improvements be described per site (including infrastructure improvements, well replacements, and electric upgrades). The commenter states that CDFA requires site-specific descriptions of existing conditions.

**Response:** Table 2 in the Draft IS-MND provides information for each project site with a notation indicating if the site is currently used for cannabis, and the first year the site switched to cannabis use, if known. In response to this comment, this table has been revised to include the past use of each site and the date when this past use ended. Additionally, new Tables 3 and 4 have been added to the IS-MND which provide the requested information, and are provided in the *Errata* section, below. These tables include existing utilities usage in addition to proposed infrastructure improvements, such as well replacements, water treatment facilities, septic tanks, roadway and parking improvements, and electric upgrades, to the extent known. Due to the number of sites and the programmatic nature of the IS-MND, these details are not known for all sites. However, the data is provided where possible.

Although all details are not currently available for all sites, it is noted that site-specific details will be required by CDFA as part of site-specific CEQA compliance. The County has prepared a checklist, which is described in more detail in the Master Response and provided in Appendix C.

### Response 1.3

**Comment:** The commenter states that the IS-MND does not specify how the County intends to comply with CEQA for individual projects that would fall under the programmatic IS-MND, as it does not provide a site-specific analysis for each site. The commenter states that impacts are not described in a project-specific way, and there is no description of which sites would require what types of improvements.

**Response:** The commenter is correct that the IS-MND provides a programmatic analysis. This is described in Section II.A, *Background*, and is intended to streamline review of these 45 project sites. On their own, each project may have qualified for a CEQA exemption; however, the County opted to prepare a programmatic analysis for all 45 sites to ensure that cumulative impacts were adequately considered, and to avoid piecemealing. As feasible, site-specific information was included, and reasonable assumptions were made to ensure a complete analysis of potential impacts. Additional site-

specific information has been added to the Final IS-MND in response to Comment 1.2 above, and site-specific information will be included in project applications for permits and approvals.

Please refer to the Master Response regarding the County's prepared checklist, which includes the above requested details (checklist provided in Appendix C).

### **Response 1.4**

**Comment:** The commenter states that a project-specific CEQA document would include a disclosure of existing uses (including water, energy, number of employees, and vehicle trips) and an analysis of impacts compared to those uses. The commenter states that CDFA cannot issue licenses absent of a site-specific CEQA analysis.

**Response:** Please refer to Response 1.3 and Response 1.4 regarding the information added to the IS-MND for existing water and energy usage.

The average number of existing regular and seasonal employees has been added to Table 2. Additionally, page 10 of the IS-MND regarding existing employees has been updated as follows to correct a prior calculation error:

The existing 45 project sites collectively have an average total of ~~780~~ 987 employees for regular operations (average of about ~~17~~ 22 employees per site), which grows by ~~159~~ 289 employees seasonally, to ~~939~~ 1,276.

As described in Appendix B to the IS-MND, trip generation calculations were conducted based on cannabis cultivation operational trip rates, less cut flower operational trip rates. This assumption accounts for the existing traffic at the project sites, and is considered to be a reasonable assumption due to the current and past uses of the project sites (please refer to Table 2 of the IS-MND; additional data on past uses has been added, indicating most sites were used for cut flower operations).

Please refer to the Master Response regarding the County's prepared checklist, which includes the above requested details (checklist provided in Appendix C).

### **Response 1.5**

**Comment:** The commenter recommends the County prepare and file Notices of Determination (NOD) with the State Clearinghouse for site-specific CEQA compliance under the programmatic CEQA document. The commenter requests the County prepare a checklist for each subsequent project that relies on the MND, and include this checklist in applications to CDFA for state cultivation licenses.

**Response:** Consistent with this comment, the County has prepared a checklist that is described in the Master Response (checklist provided in Appendix C).

Per Section 15094 of the *CEQA Guidelines*, the County will file a NOD within five working days of deciding to approve the project. It is anticipated that an NOD will be filed once following adoption of the IS-MND and approval of the project, and subsequently for each individual project covered by the programmatic IS-MND, after completion of the County's checklist for the individual project and determination that no additional environmental review is required.

### **Response 1.6**

**Comment:** The commenter recommends the County either complete a Notice of Exemption (NOE) for projects under the General Rule Exemption or for projects qualifying for a categorical exemption, where

site-specific cultivation projects are determined to be categorically exempt from CEQA. The commenter recommends that the NOE be filed with the State Clearinghouse and be provided to CDFA as part of license application packages.

**Response:** The County determined that a programmatic IS-MND should be prepared for the project, to ensure cumulative impacts were adequately addressed. Because the County does not intend to use a categorical exemption for these individual cannabis cultivation projects, this comment is not applicable. No further response is required.

### **Response 1.7**

**Comment:** The commenter states that the MND uses different baseline conditions for air quality, energy, greenhouse gas emissions, transportation, and water supply. The commenter states that a site-specific description of existing conditions, appropriate for that site, is required.

**Response:** Per *CEQA Guidelines* Section 15125(a)(1), a Lead Agency may define existing conditions by referencing historic conditions, in cases where existing conditions fluctuate over time. Given the number of individual sites and various states of agricultural operations on these sites, it was determined that a “vacant” existing condition would not be appropriate as 31 of the sites are currently in operation for cannabis. The remainder of the sites have recently been used for various agricultural activities, even if some of the sites are non-operational at present. None of the sites are fully vacant, with no prior agricultural uses—all sites have, at one point, been used for agricultural operations. The cut flower assumption was used to provide a conservative analysis, as cut flower operations are less intensive than other agricultural operations, in relation to the five impact areas identified in the MND Section II(A), *Analysis Baseline* (air quality, energy, greenhouse gas emissions, transportation, and water supply). It should be noted that using a different baseline for each project site would be complex and confusing for public reviewers, given the programmatic nature of the document. Furthermore, the majority of the project sites currently operate as cut flower operations, which is why this assumption for the existing condition baseline is considered to be representative of existing conditions.

To provide more clarity on this issue, Table 2 of the IS-MND has been revised to add a column stating the known past uses of each site, where this information is readily available. Table 2 of the Draft IS-MND already contained a column indicating if each site is currently used for cannabis.

Refer to the Master Response regarding the County’s prepared checklist (provided in Appendix C).

### **Response 1.8**

**Comment:** The commenter states that the MND should provide evidence to support the impact statements for each question in the checklist, including references for sources and information relied upon.

**Response:** Section 15088 of the *CEQA Guidelines* states that a “general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.” The commenter generally asserts that the environmental analysis needs to include substantial evidence, but does not provide specific examples of any lack of substantial evidence in the Draft IS-MND. The conclusions in the IS-MND are based on facts, reasonable assumptions, and expert opinion supported by facts, as described throughout the document, included in the appendices, and listed in the references section (Section IX of the IS-MND). To aid the reader in identifying the associated reference relevant to factual statements, citations are included throughout Section VI listing the specific source referenced by the analysis. These sources are available to the public by request from the County.

Responses to the commenter's specific concerns are provided in Response 1.9 through 1.31, below.

### **Response 1.9**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes infrastructure improvements proposed for that project and analyzes the impacts of those improvements.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C). In addition to this checklist, site-specific information about infrastructure improvements and other details requested by the commenter in prior comments has been added to the Final IS-MND via new Tables 3 and 4, where such information is currently known.

### **Response 1.10**

**Comment:** The commenter states that 939 employees are not "minimal" and requests current staffing levels at the project sites as well as the projected number of employees during project operation. The commenter requests the sources for quantification of employees be provided. The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes the number of seasonal and regular employees proposed for that project and analyzes the impacts of those employees.

**Response:** Please note that the quoted text has been revised as follows to correct a prior calculation error (page 10 of the IS-MND):

The existing 45 project sites collectively have an average total of ~~780,987~~ employees for regular operations (average of about ~~17,22~~ employees per site), which grows by ~~159,289~~ employees seasonally, to ~~939~~ 1,276.

The number employees referenced in the above sentence is not the proposed number of employees under the project, but refers the total *existing* number of seasonal plus regular employees for all 45 sites. The "minimal" staffing referenced in the IS-MND is referring to the cultivation stage specifically, which requires an average of approximately 22 employees per site (previously cited as 17 employees, as shown in the revised text above).

The number of employees under full operation of the project is provided in Section IV(A) and Section VI(3), based on the CDFA's *Economic Impact Analysis of Medical Cannabis Cultivation Program Regulations* employment projection rates (Source IX.18 in the IS-MND), with a total of 14,521 employees for all 45 sites combined. This document provides an indoor growing operation full time equivalent (FTE) employment of 0.88 FTE per 1,000 square feet and a greenhouse operation FTE employment of 1.56 FTE per 1,000 square feet.

Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.11**

**Comment:** The commenter states that the MND is unclear in its description of processing and manufacturing activities. The commenter requests that the 40-60 seasonal staff is clarified if this is required for each site or across the 45 sites, and provide support for this quantification.

**Response:** Page 10 of the IS-MND has been revised for clarity as follows:

The ~~manufacturing~~ processing stage of production requires 40-60 seasonal staff members per site.

### **Response 1.12**

**Comment:** The commenter requests that the average of 30 truck trips per day and 78 truck trips per week were calculated based on a 5-day work week, and requests clarification if these trips are for each site or across all 45 sites (with sources provided).

**Response:** The truck trip information was provided by site operators, and the total of 30 daily and 78 weekly truck trips is across all 45 sites, with some site operators providing estimated daily trips while others provided weekly trips. Page 10 of the MND has been revised for clarity as follows:

The average number of ~~total new daily~~ truck trips generated by the project sites is approximately 30 trips per day ~~and in addition to~~ approximately 78 truck trips per week for delivery of materials or supplies and shipment of product, based on information provided by the site operators.

### **Response 1.13**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes energy sources proposed for that project and analyzes the impacts related to energy, greenhouse gas (GHG) emissions, and utilities.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.14**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes water sources and infrastructure proposed for that project and analyzes the impacts related to biological resources, hydrology, energy, and utilities.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.15**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes roadway, fencing, and parking improvements proposed for that project and analyzes the impacts related to biological resources and transportation.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.16**

**Comment:** The commenter requests the IS-MND describe the current status of six sites that were not described (31 currently operating as cannabis, 8 operation for other agricultural uses, and 45 sites total).

**Response:** This was a typographical error and has been revised as follows on page 22 of the IS-MND:

Thirty-one of the sites are currently operational with licensed commercial cannabis cultivation, manufacturing, and distribution. The remaining ~~eight~~ 14 facilities are not currently operational with licensed commercial cannabis, although they are in the process of obtaining licenses. Currently, these remaining ~~eight~~ 14 facilities are operational for floral, spice, herb, and vegetable production or are not in use.

## Response 1.17

**Comment:** The commenter requests the IS-MND indicate the history and status of 20 sites that were not described (31 currently operating cannabis with only 11 sites with time frames identified). The commenter requests the status of all facilities be described.

**Response:** The remaining 20 sites are assumed to have been cultivating cannabis since 2017, when the County established cannabis regulation. Page 24 of the IS-MND has been revised for clarity as follows:

Thirty-one (31) of the greenhouse project sites are currently cultivating cannabis. Three sites have been cultivating cannabis since 2005. Seven of the project sites have been cultivating cannabis since 2015 when the Medical Cannabis Regulation and Safety Act (MCRSA) was passed in California. One site has been cultivating cannabis since 2017 when MAUCRSA was passed. The remaining 20 sites are assumed to have been cultivating cannabis since approximately 2017. Fourteen sites (14) have not been previously cultivating cannabis.

## Response 1.18

**Comment:** The commenter requests a list of all agencies requiring approval of the project be provided, including well installation, building, grading, Regional Water Quality Control Board, and State Water Resources Control Board permits, including the specific permit required from each agency and whether those permits have been obtained.

**Response:** A list of agencies with approval authority is provided in Section II(B) on page 24-25 of the IS-MND. The list specific permits potentially required by each agency were also added to this section as follows:

### **B. Other Public Agencies Whose Approval May be Required:**

California Department of Food and Agriculture (CalCannabis)

- State Cannabis License

Department of Public Health (Manufactured Cannabis Safety Branch (MCSB))

- On-site Wastewater Treatment System Permit

County of Monterey

- Commercial Cannabis Business Permit
- Cannabis Use Permit
- Coastal Development Permit

Bureau of Cannabis Control (Distribution)

- Cannabis Distribution Permit

California State Water Resources Control Board (SWRCB)

- NPDES Construction General Permit
- Cannabis General Order

California Department of Fish & Wildlife (DFW)

- Lake and Streambed Alteration
- Incidental Take Statement or Incidental Take Permit

Monterey Bay Air Resources District (MBARD)

- Authority to Construct, if required
- Permit to Operate, if required

## **Response 1.19**

**Comment:** The commenter requests an analysis of whether and how cannabis cultivation operations contribute to fire risk and whether those risks impact public services.

**Response:** Wildfire impacts are addressed on pages 30-31 of the Draft IS-MND. As described therein, the project would not substantially alter the sites in a way that would exacerbate wildfire hazards, nor cause flooding or landslides from post-fire geologic conditions. Additionally, impacts to public services, including fire protection facilities, are discussed on pages 29-30 of the Draft IS-MND. This section describes the nearest fire station to the project sites, and notes that the project would not result in the construction of habitable structures or an increase in the population of the area from increased employment opportunities. New or physically altered fire protection facilities would not be required. Section IV(A) of the Draft IS-MND also states that “[c]annabis businesses are required to pay a tax per square foot that goes directly to funding the fire district, per a measure passed in June 2018.” This tax ensures that fire districts are adequately funded to provide fire protection services to commercial cannabis sites. The IS-MND finds “[t]he project would not result in the provision of or need for new or physically altered fire protection facilities.”

## **Response 1.20**

**Comment:** The commenter requests an analysis of how cannabis operations differ from other agricultural operations or residential or commercial development and how those differences affect public services.

**Response:** Commercial cannabis cultivation is similar to other forms of agricultural uses except that there are more stringent regulatory requirements for cannabis and some growing and processing techniques vary from other agricultural commodities (e.g. lighting controls and drying and trimming activities). Security of cannabis and cannabis products is also of concern given the nature and value of the crop. Security of the proposed cannabis cultivation sites would not be provided by local law enforcement, unless applicants enter into an agreement with these agencies for the provision of security services. Otherwise, security would be provided by the site owner and applicant, as determined necessary by the owner. As described on page 30 of the IS-MND:

The project’s employment would be from within the community and is not be anticipated to pull population from outside of the area, and the project would not facilitate the construction of habitable structures that would require additional facilities. [Therefore], the project would not result in significant additional demand for police protection services since the project does not include new residential or commercial development.

Impacts to police protection services are described in Section IV of the Draft IS-MND, on pages 29-30. As noted therein, the project would not facilitate the construction of new habitable structures and project

employment is anticipated to be sourced from within the community, resulting in no increase in population in the County. Therefore, the IS-MND concluded the project would not result in additional demand for police services, or new or physically altered police protection facilities. It should also be noted that the Bureau of Cannabis Control Text of Regulations requires cannabis cultivation facilities to implement security measures to prevent the theft of product, through the use of secured storage areas, video surveillance systems, contract with security personnel, commercial-grade door locks, and an alarm system (refer to Article 5, Security Measures).

### **Response 1.21**

**Comment:** The commenter states that the estimated 14,521 employees in Section VI(3)(a) is not consistent with the 939 employees cited in the project description.

**Response:** Please refer to Response 1.10 regarding employment calculations and revisions to correct a calculation error. The 939 employee estimate (revised to 1,276 to resolve the calculation error) is the total *existing* number of seasonal plus regular employees for all 45 sites, while the 14,521 employee calculation is the total number of new employees that would be generated as a result of the project. Page 10 of the IS-MND has been revised for clarity as follows:

The existing 45 project sites collectively have an average total of ~~780,987~~ employees for regular operations (average of about ~~17.22~~ employees per site), which grows by ~~159,289~~ employees seasonally, to ~~939~~ 1,276. It is anticipated that the project would result in approximately 14,521 new employees across the 45 project sites.<sup>1</sup>

<sup>1</sup> Calculated using an estimate of full time equivalent (FTE) employment of 0.88 FTE per 1,000 square feet and a greenhouse operation FTE employment of 1.56 FTE per 1,000 square feet.

### **Response 1.22**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes the location of sensitive receptors near that project and analyzes the impacts on those receptors.

**Response:** Page 89 of the IS-MND states: “all of the sites are surrounded by other agricultural activity as opposed to sensitive receptor uses, such as residential, park, and school uses” and “[t]he nearest residential neighborhoods are located approximately two miles to the north in Salinas. Single-family residences accessory to the agricultural use are located on some project sites and also on some of the adjacent agricultural properties.” The distance to the nearest sensitive receptor is used in the calculation of noise impacts (Section VI.13 of the Draft IS-MND), and a minimum distance of 50 feet from the nearest receiver to the center of the construction area (center of the project site).

Refer to the Master Response regarding the County’s prepared checklist (provided in Appendix C).

### **Response 1.23**

**Comment:** The commenter requests a description of the legal and regulatory requirements supporting the County’s actions to ensure no odor impacts would occur.

**Response:** The provision of a contact for public notice of issues is a requirement of Monterey County Code Section 7.90.100.A.16. A reference to this code section has been added to the IS-MND on page 50 as follows:

In addition, per Monterey County Code Section 7.90.100.A.16, the facilities must provide a contact that the public can reach to provide notice of issues with the cannabis operation, including odors.



The IS-MND also cites Section 7.90.100.A.8 regarding odor prevention devices required by the Monterey County Code. As described in Section VI(3)(d), the project sites are in rural and agricultural areas, on and adjacent to large lots with large setbacks from neighboring uses and sensitive receptors. The majority of the project area has been used for intensive agricultural uses, which is supported by the County and protected by the County's right-to-farm ordinance (Chapter 16.40 of the County Municipal Code), which states that properly operating farms are not a nuisance. Should odors become a nuisance for neighbors of the project sites, the community relations contact can be contacted to address and rectify the issue.

Section 15088 of the *CEQA Guidelines* states that a "general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." The commenter generally asserts that the analysis of odor impacts needs to include substantial evidence, but does not provide specific examples of any lack of substantial evidence in the Draft IS-MND or evidence that contradicts the conclusions in the Draft IS-MND. As such, a more detailed response to this comment is not possible.

### **Response 1.24**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes water use at the site and groundwater uses proposed for that project and analyzes the impacts related to groundwater.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.25**

**Comment:** The commenter requests a description of current conditions related to water use, and states that the water use scenarios described in Section VI(10)(b) do not match the project description.

**Response:** Section II(A) of the IS-MND indicates that water supply would be provided from on-site or shared groundwater wells. This is consistent with the discussion in Section VI(10), which identifies groundwater wells as the source of water supply for the project.

Section II(A), *Analysis Baseline*, states that water supply baseline assumptions "accounts for the prior use of the greenhouses for various agricultural production, excluding cannabis; primarily cut flowers." This is consistent with the four scenarios described in Section VI(10)(b). The reason four scenarios were included here was to demonstrate that under both high and low existing water use assumption scenarios (based on an assumed existing use of cut flower production), the project would decrease total water use across all 45 sites. The IS-MND indicates that assuming all project sites are being converted from cut flower operation to cannabis cultivation would realistically over-estimate existing water usage, which is why low utilization scenarios were included alongside high utilization scenarios in the analysis.

### **Response 1.26**

**Comment:** The commenter states that the aquifer description on page 68 does not match the description on page 67.

**Response:** Section VI(10)(e), beginning on page 80 of the Final IS-MND, has been revised as follows:

The proposed project is located primarily within the East Side Aquifer Subbasin, with ~~two~~ four project sites located within the 180/400 Foot Aquifer Subbasin...

### **Response 1.27**

**Comment:** The commenter states that the IS-MND should list all tribes contacted regarding the project, along with the date of contact and whether any additional tribes responded.

**Response:** The IS-MND identifies the tribe contacted (Ohlone-Costanoan, Esselen Nation) by the County, including the date contacted and general response from the tribe in Section VI(18)(a-b). The Ohlone-Costanoan, Esselen Nation is the only tribe to date that has requested to be engaged by the County in AB 52 tribal consultation. Because the information requested by the commenter is already included in the Draft IS-MND, no revisions have been made in response to this comment.

### **Response 1.28**

**Comment:** The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes wastewater treatment systems or septic systems proposed for that project and analyzes the impacts related to such systems.

**Response:** Refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.29**

**Comment:** The commenter states that the conclusion in Section VI(19)(a) contradicts prior text stating that relocation or construction of new utilities may be required. The commenter states that applications for annual licenses require the submittal of a site-specific CEQA document that describes whether new or expanded water, wastewater, electric, or other infrastructure is proposed for that project and analyzes the impacts related to such improvements.

**Response:** While the project may require new on-site utilities infrastructure and/or connections to off-site utilities infrastructure (such as replacement wells, new on-site water tanks, and new on-site water treatment systems), construction of these features is considered in the IS-MND, and the relocation or construction of new off-site utilities facilities or infrastructure to serve the project sites would not be required. The intent of the threshold in question is to identify whether additional infrastructure would be required, the construction of which could have impacts not already disclosed. This is not the case for the project. Therefore, the conclusion in Section VI(19)(a) is accurate. To clarify, the text on page 103 has been revised as follows:

Based on the above discussion, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities not included as part of the project, the construction or relocation of which could cause significant environmental effects.

Regarding the need for a site-specific CEQA document, refer to the Master Response regarding the County's prepared checklist (provided in Appendix C).

### **Response 1.30**

**Comment:** The commenter requests referred mitigation measures be listed in the MND, or at least be provided by number.

**Response:** In response to this comment, Section VII(b) has been revised as follows on page 109 of the IS-MND:

Mitigation Measures TRA-1, TRA-2, and TRA-3 are ~~is~~ required to reduce project impacts...

### **Response 1.31**

**Comment:** The commenter requests identification of other cannabis operations in the vicinity of the project and an analysis of cumulative impacts with these other projects.

**Response:** In response to this comment, page 109 of the IS-MND has been revised as follows:

**Mandatory Findings of Significance VII (b) – Less than Significant with Mitigation Incorporated.**

There are 17 applications for cannabis use permits on sites located within five miles of the 45 project sites. Of these 17 sites, two are approved, five are under condition compliance, six are undergoing review, one was withdrawn, one was appealed, and two remain incomplete. Therefore, 15 cannabis cultivation sites are considered cumulative cannabis projects in the vicinity of the 45 sites (the 17 applications, excluding those that have been withdrawn or appealed).

The proposed project was determined to have no impact related to Population and Housing, Public Services, Recreation, and Wildfire. Therefore, as there would be no direct or indirect impacts, the proposed project would not contribute to cumulative impacts to these issue areas.

For all other issue areas, the proposed project would have either direct or indirect impacts that have been determined to be less than significant, with or without mitigation incorporated. The project would not adversely affect biological, cultural, or other physical resources outside of the project sites. Other impacts, such as noise and GHG emissions, would be minor and would not be cumulatively considerable. Thus, the effects of the project would not combine with impacts from other projects in the vicinity, including nearby existing and proposed cannabis cultivation sites, to result in a significant cumulative impact.

As discussed in Section 17-16, Transportation, the project would result in impacts to four intersections and one roadway segment under near-term plus project conditions and impacts to ten intersections and three roadway segments under cumulative plus project conditions. Mitigation Measures TRA-1, TRA-2, and TRA-3 are ~~is~~ required to reduce project impacts, including installation and optimization of traffic signals, acceleration lanes, and payment of impact fees and the fair share costs associated with each project's contribution to the cumulative impacts. Traffic from nearby existing cannabis cultivation sites was included in the existing traffic counts, and future cannabis cultivation sites near the project sites would be required to pay a similar traffic impact fee for increased trips at those intersections. Impacts would be *less than significant with mitigation incorporated*.

**DEPARTMENT OF TRANSPORTATION**

CALTRANS DISTRICT 5  
 50 HIGUERA STREET  
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**Letter 2**

Making Conservation  
 a California Way of Life.

July 17, 2020

MON/Var  
 SCH#2020060325

Craig Spencer  
 Monterey County Resource Management Agency  
 1441 Schilling Place  
 Salinas, CA 93901

Dear Mr. Spencer:

COMMENTS FOR THE MITIGATED NEGATIVE DECLARATION (MND) – MULTIPLE CANNABIS CULTIVATION FACILITIES IN UNINCORPORATED MONTEREY COUNTY

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the MND for the Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County project which would turn 45 existing greenhouses into cannabis operating facilities. Caltrans offers the following comments in response to the MND:

- 2.1 1. The Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel and development. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.
- 2.2 2. The Transportation Agency for Monterey County (TAMC) collects development impact fees to help fund transportation projects of regional significance to address project long-range traffic impacts. Caltrans supports payment of the adopted TAMC development impact fees as required to mitigate any cumulative impacts.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or [Christopher.Bjornstad@dot.ca.gov](mailto:Christopher.Bjornstad@dot.ca.gov).

Sincerely,

*Chris Bjornstad*

Chris Bjornstad  
 Associate Transportation Planner  
 District 5 Development Review

## Letter 2

**COMMENTER:** Chris Bjornstad, Associate Transportation Planner, Department of Transportation

**DATE:** July 17, 2020

### **Response 2.1**

**Comment:** The commenter states that projects supporting smart growth principles are supported by Caltrans.

**Response:** Comment noted. The project does not include any off-site roadway improvements by design, and through the payment of transportation impact fees would fund transportation improvements at affection intersections and roadways (refer to Section VI[17] of the IS-MND). Because the comment does not pertain to the adequacy of the IS-MND or CEQA process, no further response is required.

### **Response 2.2**

**Comment:** The commenter states that the Transportation Agency for Monterey County (TAMC) collects impact fees to fund regional transportation projects, and Caltrans supports the payment of such fees to mitigate impacts.

**Response:** Comment noted. Mitigation Measure TRA-2 requires the payment into the TAMC Regional Development Impact Fee Program. Because the comment does not pertain to the adequacy of the IS-MND or CEQA process, no further response is required.



July 17, 2020

County of Monterey  
Resource Management Agency  
ATTN: Craig Spencer, RMA – Planning Services Manager  
1441 Schilling Pl South 2<sup>nd</sup> Floor  
Salinas, CA 93901

Email: [CEQAcomments@co.monterey.ca.us](mailto:CEQAcomments@co.monterey.ca.us)  
[spencerc@co.monterey.ca.us](mailto:spencerc@co.monterey.ca.us)

Re: Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County (REF 150048)

Dear Mr. Spencer:

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments:

**3. AIR QUALITY**

3.1

- **Construction/Building Demolition/Renovation and Trenching Activities:** Page 32 mentioned minor greenhouse retrofit work might occur at existing facilities. Any construction activity that involves the disturbance or removal of building materials in or on the greenhouses or other associated structures must be thoroughly inspected for asbestos by a California Certified Asbestos Consultant (CAC) prior to the construction activity, as regulated by the Federal EPA Asbestos NESHAP (National Emission Standards of Hazardous Air Pollutants) and MBARD District Rule 424.

Greenhouses are known to contain boilers with associated steam and water lines which may be coated and wrapped with asbestos materials. Work to remove any regulated quantities of asbestos must be notified to the Air District at least 10 working days prior to the beginning work.

Any load-bearing removal in the structures is defined as a demolition activity by the Federal EPA Asbestos NESHAP regulation and District Rule 424. This activity must be also notified to the Air District at least 10 working days prior to the work.

Please contact Shawn Boyle or Cindy Searson in the Compliance Division at (831) 647-9411 for more information regarding these rules. <https://www.arb.ca.gov/drdb/mbu/cur.htm>

3.2

- **Portable and Stationary Equipment:** An Air District permit to operate or statewide portable equipment registration may be required for portable equipment such as engine generator sets and air compressors. Permits are also required for stationary equipment such as generators, hash oil processing, and boilers greater than 2 MMBTU/hr for natural gas, or 250,000 BTU/hr for any fuel other than natural gas. If the project will be utilizing portable or stationary equipment, please make sure to contact the Air District’s Engineering Division at (831) 647-9411 to discuss if a Portable Equipment Registration is necessary for this project.

3.3

- **Greenhouse Odors:** The Air District supports the requirement that odor abatement measures, including commercial air scrubbing and filtration systems, are required for cannabis cultivation, processing and

## Letter 3

3.3  
cont.

manufacturing. An Air District Authority to Construct and Permit to Operate is required for odor control devices, fume hoods, and engine generator sets. Please contact the Air District's Engineering Division at (831) 647-9411 if you have questions about permitting.

3.4

- **Prohibit Cannabis Material Burning:** In an ongoing effort to reduce PM2.5 emissions and reduce the potential for public nuisance, the Air District recommends prohibiting open burning of cannabis materials.

3.5

### 8. GREENHOUSE GAS EMISSIONS & 17. TRANSPORTATION:

- **EV Use and Infrastructure:** To achieve further emission reduction of criteria pollutants and greenhouse gases, the Air District suggests the inclusion of EV infrastructure for EV fleets / delivery vehicles and installation of publically available EV charging stations at cannabis facility parking areas.

Please let me know if you have any questions. I can be reached at (831) 718-8021 or [hmuegge@mbard.org](mailto:hmuegge@mbard.org).

Best Regards,



Hanna Muegge  
Air Quality Planner

cc: Richard A. Stedman  
David Frisbey

## Letter 3

**COMMENTER:** Hanna Muegge, Air Quality Planner, Monterey Bay Air Resources District (MBARD)

**DATE:** July 17, 2020

### **Response 3.1**

**Comment:** The commenter states that the disturbance and removal of building materials or structures must be inspected for asbestos prior to construction, and asbestos may be present in materials wrapping boilers.

**Response:** Comment noted. Building materials removal would comply with MBARD Rule 424 and USEPA asbestos regulations. Where applicable, existing boilers would be kept in place for projects that include greenhouse retrofitting. For clarity, the following text has been added to Section VI.9 of the Draft IS-MND on page 73:

The Resource Conservation and Recovery Act (RCRA) also established hazardous waste disposal requirements; please refer to 40 CFR parts 260 through 273. Any removal of building materials that may contain asbestos would be conducted in compliance with MBARD Rule 424 and USEPA asbestos regulations.

Additionally, the IS-MND has been revised to clarify that demolition and construction of greenhouses could occur on up to 25 percent of all project sites. Please refer to the *Errata* section below for the full list of revisions. This clarification does not result in the presentation of new substantial adverse environmental effects. None of these changes introduces significant new information or affects the conclusions of the IS-MND.

### **Response 3.2**

**Comment:** The commenter states that an Air District permit to operate portable equipment may be required for engine generator sets and air compressors. Stationary equipment such as generators, hash oil processing and boilers greater than 2 MMBtu/hour for natural gas or 250,000 Btu/hour for other fuels would also require permits.

**Response:** Comment noted. Projects requiring the use of engine generator sets, air compressors, and certain portable or stationary equipment would obtain the appropriate Air District permits, as required by MBARD. MBARD has been added to the list of approval agencies in Section II(B) of the IS-MND, along with a list of the potential permits that could be required. Please refer to Response 1.18, where this revision is shown. Additionally, the following text on page 50 of the Draft IS-MND has been revised as follows:

These regulations also require renewable energy requirements for all indoor tier 2 mixed-light and nurseries using indoor tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity meets the average greenhouse gas emissions intensity required by their local utility provider pursuant to the California Renewables Portfolio Standard Program, beginning January 1, 2023 . Additionally, portable equipment may be subject to regulation by MBARD, which requires a permit to operate be obtained for stationary equipment such as generators, hash oil processing, and boilers greater than 2 MMBtu/hour for natural gas or 250,000 Btu/hour for other fuels. MBARD also requires an Authority to Construct and Permit to Operate be obtained for odor control devices, fume hoods, and engine generator sets.



### **Response 3.3**

The commenter expresses support for the odor abatement measures, and notes that an Air District Authority to Construct and Permit to Operate is required for odor control devices, fume hoods, and engine generator sets.

Comment noted. Projects requiring the use of odor control devices, fume hoods, and engine generator sets would obtain the appropriate Air District permits, as required by MBARD. MBARD has been added to the list of approval agencies in Section II(B) of the IS-MND, along with a list of the potential permits that could be required. Please refer to Response 1.18, where this revision is shown. Additionally, text on page 50 of the Draft IS-MND has been revised, as shown in Response 3.2.

### **Response 3.4**

The commenter recommends prohibiting open burning of cannabis materials.

This suggestion is noted. The Monterey County Department of Environmental Health does not allow the burning of cannabis waste, but does allow it to be processed at a transformation facility as waste energy; however, the only such facility in Monterey County does not accept cannabis waste from outside facilities. Because the project would not include open burning of cannabis materials, no revisions to the IS-MND are required in response to this comment. For clarification, however, the following revisions have been made to the IS-MND:

On-site composting is possible but not required for the project sites; most green waste would be hauled and disposed of offsite, for composting at the landfill. The County does not allow for burning of cannabis waste on the project sites. (page 22)

No fireplaces would be associated with any of the proposed uses, and the County does not allow the burning of cannabis waste on the project sites. (page 42)

### **Response 3.5**

The commenter suggests the inclusion of electric vehicle (EV) infrastructure for EV fleets and delivery vehicles and the installation of public EV charging stations in cannabis facility parking areas.

The County does not require the provision of EV infrastructure or parking spaces; however, some of the sites would provide EV parking spaces. This information, where available, has been added to the IS-MND in a new table, Table 4, under the "Parking" column. It should be noted that the County does not require EV infrastructure be constructed at cannabis cultivation sites, but does require the use of alternative fuel vehicles for distribution. Additionally, potential GHG emission impacts were determined to be less than significant, with no mitigation required (refer to Section VI.8 of the IS-MND).

## Errata

This section presents a summary of minor modifications to the Draft IS-MND text following publication, including those made in direct response to a comment and corrections of typographical or other minor errors. Deletions are noted by ~~strikeout~~ and insertions by underline. Revisions made in response to a specific comment received are detailed above.

The below revisions correct minor errors or clarify information. The majority of the changes provided below are related to the assumptions in the IS-MND regarding demolition and rebuild of greenhouses on the project sites. The IS-MND has been revised to clarify that the project includes the demolition and construction on approximately 25 percent of the project sites. These changes do not result in the presentation of new substantial adverse environmental effects. None of these changes introduces significant new information or affects the conclusions of the IS-MND.

Page 2, I. Background Information:

**Date Prepared:** April 2020, revised October 2020

Page 9, Project Description:

The project would ~~not require~~ result in the demolition of ~~existing facilities or~~ and construction of new facilities on approximately 25 percent of the project sites, with the remainder of the sites using as the cannabis operations would use existing greenhouses or buildings for cannabis operations. ~~Should any sites require demolition or rebuilding in the future, additional CEQA review may be required when such activities are proposed.~~

Page 10, Operations and Utilities:

The ~~manufacturing~~ processing stage of production requires 40-60 seasonal staff members per site. Plants are processed by cutting, trimming, and drying. The dried product is then packaged on-site and prepared for distribution. A portion of the plants are cut into smaller plants and cloned for distribution to other facilities. The existing 45 project sites collectively have an average total of ~~780~~ 987 employees for regular operations (average of about ~~17~~ 22 employees per site), which grows by ~~159~~ 289 employees seasonally, to ~~939~~ 1,276. It is anticipated that the project would result in approximately 14,521 new employees across the 45 project sites.<sup>1</sup> Hours of operation vary by site but fall within the hours of 6 AM and 10 PM daily. The average number of total new daily truck trips generated by the project sites is approximately 30 trips per day ~~and in addition to~~ approximately 78 truck trips per week for delivery of materials or supplies and shipment of product, based on information provided by the site operators.

**Utilities.** Operational power of the proposed cannabis facilities would be provided by Pacific Gas & Electric (PG&E). Each site has access to PG&E electrical and natural gas lines. Table 3 provides the existing utilities service information, including water use, wastewater generation, and energy use, and Table 4 provides the proposed infrastructure improvements required, to the extent known.

<sup>1</sup> Calculated using an estimate of full time equivalent (FTE) employment of 0.88 FTE per 1,000 square feet and a greenhouse operation FTE employment of 1.56 FTE per 1,000 square feet.

Page 11-20, Table 2 revisions and new Tables 3 and 4:

**Table 2 Maximum Buildout for Project Site**

Site Number	Address	Parcel Size (acres)	Past Use (When Use Ended)	Currently Used for Cannabis?	Current Average Number of Regular Employees (Seasonal Employees)	Cultivation Building Area (sf)	Processing Building Area (sf)	Distribution Building Area (sf)	Manufacturing Building Area (sf)
1	22785 Fuji Ln, Salinas, CA 93908	10.0	<u>Cut flowers (unknown)</u>	Yes	<u>20 (20)</u>	239,652	N/A	N/A	N/A
2	22750 Fuji Ln, Salinas, CA 93908	10.0	<u>Cut flowers (unknown)</u>	No	<u>20 (20)</u>	210,460	31,325	N/A	N/A
3	22835 Fuji Ln, Salinas, CA 93908	10.0	<u>Cut flowers (unknown)</u>	Yes	<u>20 (20)</u>	238,463	34,342	N/A	N/A
4	23760 Potter Road Salinas, CA 93908	N/A	<u>Cut flowers (unknown)</u>	No	<u>20 (20)</u>	290,000	N/A	N/A	N/A
5	23940 Potter Rd, Salinas, CA 93908	12.3	<u>Cut flowers (2016)</u>	Yes	<u>30 (30)</u>	269,941	7,058	N/A	N/A
6	20180 Spence Rd, Salinas, CA 93908	11.0	<u>Cut flowers (unknown)</u>	Yes	<u>25 (25)</u>	268,560	16,786	N/A	N/A
7	25950 Encinal Rd, Salinas, CA 93908	9.9	<u>Cut flowers (unknown)</u>	Yes	<u>10 (20)</u>	459,510	4,635	N/A	N/A
8	26000 Encinal Rd, Salinas, CA 93908	10.6	<u>Cut flowers (unknown)</u>	Yes	<u>10 (20)</u>	Shared with Site 8	Shared with Site 8	N/A	N/A
9	50 Zabala Rd, Salinas, CA 93908	40.3	<u>Cut flowers (unknown)</u>	Yes	<u>15 (18)</u>	140,000	2,400	N/A	N/A
10	22790 Fuji Ln, Salinas, CA 93908	15.0	<u>Cut flowers (still in use)</u>	Yes	<u>40 (40)</u>	236,000	1,350	N/A	2,400
11	26900 Encinal Rd, Salinas, CA 93908	10.0	<u>Cut flowers (1990)</u>	Yes	<u>15 (20)</u>	220,000	5,000	5,000	6,000
12	18 Hartnell Rd, Salinas, CA 93908	11.6	<u>Unknown (unknown)</u>	Yes	<u>10 (15)</u>	82,900	2,264	N/A	N/A
13	2272 Alisal Rd, Salinas, CA 93908	9.6	<u>Unknown (unknown)</u>	Yes	<u>24 (17)</u>	190,600	3,800	N/A	N/A
14	25600 Encinal Rd, Salinas, CA 93908	13.7	<u>Trucking yard (2015)</u>	Yes	<u>8 (15)</u>	57,000	2,529	N/A	N/A
15	20420 Spence Rd, Salinas, CA 93908	20.0	<u>Cut flowers and vegetables (still in use)</u>	Yes	<u>30 (50)</u>	288,633	6,125	N/A	700

County of Monterey  
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Site Number	Address	Parcel Size (acres)	Past Use (When Use Ended)	Currently Used for Cannabis?	Current Average Number of Regular Employees (Seasonal Employees)	Cultivation Building Area (sf)	Processing Building Area (sf)	Distribution Building Area (sf)	Manufacturing Building Area (sf)
16	20510 Spence Rd, Salinas, CA 93908	10.2	<u>Cut flowers (unknown)</u>	No	<u>15 (20)</u>	154,588	N/A	N/A	N/A
17	23820 Potter Rd, Salinas, CA 93908	10.0	<u>Cut flowers and trucking yard (unknown)</u>	Yes	<u>15 (20)</u>	170,484	10,164	N/A	N/A
18	2338 Alisal Rd, Salinas, CA 93908	9.3	<u>Cut flowers (still in use)</u>	Yes	<u>40 (60)</u>	204,704	3,200	N/A	N/A
19	26500 Encinal Rd, Salinas, CA 93908	19.4	<u>Flower nursery (2017)</u>	Yes	<u>65 (80)</u>	550,000	1,320	10,320	900
20	20800 Spence Rd, Salinas, CA 93908	10.0	<u>Recycling plant (2016)</u>	No	<u>10 (20)</u>	3,457	N/A	N/A	33,522
21	25700 Encinal, Salinas, CA 93906	12.5	<u>Cut flowers (2017)</u>	No	<u>12 (20)</u>	171,503	3,200	2,544	N/A
22	20954 Spence Rd, Salinas, CA 93908	1.7	<u>Unknown (2016)</u>	No	<u>6 (8)</u>	N/A	N/A	N/A	3,000
23	2262 Alisal Rd, Salinas, CA 93908	9.7	<u>Agriculture (2015)</u>	N/A	<u>50 (55)</u>	171,605	3,814	1,179	N/A
24	20400 Spence Rd, Salinas, CA 93908	21.4	<u>Agriculture and floral production (2015)</u>	N/A	<u>20 (24)</u>	237,750	5,000	2,400	N/A
25	26800 Encinal Rd, Salinas, CA 93908	10.0	<u>Orchids, flowers, vegetable plants (2016)</u>	Yes	<u>40 (60)</u>	263,680	8000	3000	10,414
26	2242 Alisal Rd , Salinas, CA 93908	22.0	<u>Berry and vegetable production (2017)</u>	Yes	<u>N/A</u>	239,400	10,000	1,850	2,500
27	20220 Spence Rd, Salinas, CA 93908	10.0	<u>Beneficial insect production (still in use)</u>	No	<u>20 (20)</u>	214,273	12,000	3,590	6,000

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28	26889 Encinal Rd, Salinas, CA 93908	47.2	<u>Schubert Nursery Topiary (2017)</u>	Yes	<u>150 (150)</u> [maximums]	464,360	20,682	5,000	5,000
29	20260 Spence Rd, Salinas, CA 93908	10.0	<u>Cut flower and agriculture (2015)</u>	Yes	<u>12 (24)</u>	247,000	8,922	2,515	7,000
30	20240 Spence Rd, Salinas, CA 93908	11.5	<u>Agriculture and cut flowers (2015)</u>	Yes	<u>15 (22)</u>	177,965	7,200	3,123	0
31	2340 Alisal Rd, Salinas, CA 93908	9.3	<u>Herbs, flowers, and vegetable cultivation (2018)</u>	Yes	<u>14 (24)</u>	206,700	3,276	2,100	0
32	27020 Encinal Rd, Salinas, CA 93908	48.9	<u>Cut flowers, herbs, ornamentals, and vegetable seedlings (still in use)</u>	N/A	<u>N/A</u>	228,216	8,000	2,000	800
33	370 Espinosa Rd, Salinas, CA 93907	30.0	<u>Flower products and vegetables (still in use)</u>	2015	<u>50 (80)</u>	308,159		12,254	
34	360 Espinosa Rd, Salinas, CA 93907	30.3	<u>Herbs, floral products, and vegetables (2018)</u>	Yes	<u>50 (90)</u>	611,113	7,829	1,200	2,533
35	27040 Encinal Rd, Salinas, CA 93908	42.6	<u>Cut flowers, herbs, ornamentals, and vegetable seedlings (still in use)</u>	N/a	<u>N/A</u>	326,000	8,000	2,500	2,500

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Site Number	Address	Parcel Size (acres)	Past Use (When Use Ended)	Currently Used for Cannabis?	Current Average Number of Regular Employees (Seasonal Employees)	Cultivation Building Area (sf)	Processing Building Area (sf)	Distribution Building Area (sf)	Manufacturing Building Area (sf)
36	23640 Potter Rd, Salinas, CA 93908	10.0	<u>Floral and spice production (unknown)</u>	2015	<u>11 (15)</u>	272,603	1,025	896	N/A
37	22730 Fuji Ln, Salinas, CA 93908	10.0	<u>Floral and spice production (unknown)</u>	2005	<u>18 (25)</u>	135,300	1,050	814	0
38	398 Natividad Rd, #A, Salinas, CA 93906	40.0	<u>Row crop, row crop cultivation, and flower cultivation (2017, partially)</u>	Yes (partially)	<u>15 (20)</u>	176,004	3,000	2,000	0
39	20200 Spence Rd, Salinas, CA 93908	10.0	<u>Cultivation flower (2017, partially)</u>	Yes (partially)	<u>15 (20)</u>	268900	5,600	2,200	0
40	22900 Fuji Lane, Salinas, CA 93908	24.0	<u>Beneficial insect production (still in use)</u>	No	<u>30 (45)</u>	N/A	196,000	4,480	6,000
41	23700 Potter Rd, Salinas, CA 93908	8.4	<u>Non-cannabis agriculture (unknown)</u>	Yes	<u>N/A</u>	99288	6,685	400	
42	1230 River Road, Salinas, CA 93908	0.8	<u>Residential (still in use)</u>	No	<u>N/A</u>	190	0	0	0
43	26100 Old Stage Road	10.0	<u>Agricultural (2016)</u>	Yes	<u>N/A</u>	500	576	0	0
44	564 River Road, Salinas, CA 93908	5.0	<u>Residential (still in use)</u>	Yes	<u>N/A</u>	7,520	1,984	923	0
45	2378 Alisal Rd, Salinas, CA 93908	11.6	<u>Cut flowers (still in use)</u>	No	<u>16 (24)</u>	330,000	N/A	N/A	N/A
<b>Total</b>					<b><u>987 (1,276)</u></b>	<b>9,106,981</b>	<b>458,395</b>	<b>57,534</b>	<b>86,769</b>

Notes: N/A = not available/unknown

**Table 3 Existing Utilities Usage**

<u>Site Number</u>	<u>Address</u>	<u>Current Water Use (GPD)</u>	<u>Current Wastewater Provider</u>	<u>Current Energy Use (kWh/year)</u>	<u>Current Energy Source</u>
<u>1</u>	<u>22785 Fuji Ln</u>	<u>17,000</u>	<u>Septic</u>	<u>1,200</u>	<u>Utility</u>
<u>2</u>	<u>22750 Fuji Ln</u>	<u>45,000</u>	<u>Septic</u>	<u>72,000</u>	<u>Utility</u>
<u>3</u>	<u>22835 Fuji Ln</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>4</u>	<u>23760 Potter Rd</u>	<u>17,000</u>	<u>Septic</u>	<u>6,000</u>	<u>Utility</u>
<u>5</u>	<u>23940 Potter Rd</u>	<u>50,000</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility</u>
<u>6</u>	<u>20180 Spence Rd</u>	<u>50,000</u>	<u>Septic</u>	<u>1,500,000</u>	<u>Utility</u>
<u>7</u>	<u>25950 Encinal Rd</u>	<u>1,000,000</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility</u>
<u>8</u>	<u>26000 Encinal Rd</u>	<u>*data combined with 25950 Encinal Rd (above)</u>			
<u>9</u>	<u>50 Zabala Rd</u>	<u>3,732</u>	<u>SP Sanitation</u>	<u>1,169,916.25</u>	<u>Utility</u>
<u>10</u>	<u>22790 Fuji Ln</u>	<u>17,000</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility and generator</u>
<u>11</u>	<u>26900 Encinal Rd</u>	<u>3,000</u>	<u>Septic</u>	<u>19,200,000</u>	<u>Utility</u>
<u>12</u>	<u>18 Hartnell Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>13</u>	<u>2272 Alisal Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>14</u>	<u>25600 Encinal Rd</u>	<u>7,976</u>	<u>Septic</u>	<u>300,000</u>	<u>Utility</u>
<u>15</u>	<u>20420 Spence Rd</u>	<u>20,000</u>	<u>Septic</u>	<u>1,621,250</u>	<u>Utility</u>
<u>16</u>	<u>20510 Spence Rd</u>	<u>4,000</u>	<u>Septic</u>	<u>27,000</u>	<u>Utility</u>
<u>17</u>	<u>23820 Potter Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>18</u>	<u>2338 Alisal Rd</u>	<u>N/A</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility</u>
<u>19</u>	<u>26500 Encinal Rd</u>	<u>26,796,000</u>	<u>Septic</u>	<u>1,200</u>	<u>Utility</u>
<u>20</u>	<u>20800 Spence Rd</u>	<u>N/A</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility</u>
<u>21</u>	<u>25700 Encinal Rd</u>	<u>N/A</u>	<u>Septic</u>	<u>N/A</u>	<u>Utility</u>
<u>22</u>	<u>20954 Spence Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>23</u>	<u>2262 Alisal Rd</u>	<u>20,000</u>	<u>Septic</u>	<u>1,080,000</u>	<u>Utility</u>
<u>24</u>	<u>20400 Spence Rd</u>	<u>20,000</u>	<u>Septic</u>	<u>1,100,000</u>	<u>Utility and generator</u>
<u>25</u>	<u>26800 Encinal Rd</u>	<u>12,513</u>	<u>Septic</u>	<u>960,000</u>	<u>Utility and generator</u>
<u>26</u>	<u>2242 Alisal Rd</u>	<u>N/A</u>	<u>Septic</u>	<u>0</u>	<u>Utility</u>
<u>27</u>	<u>20220 Spence Rd</u>	<u>N/A</u>	<u>Septic</u>	<u>1</u>	<u>Utility</u>
<u>28</u>	<u>26889 Encinal Rd</u>	<u>45 to 50</u>	<u>Septic</u>	<u>3,805,601.02</u>	<u>Utility and generator (back up only)</u>
<u>29</u>	<u>20260 Spence Rd</u>	<u>3,000</u>	<u>On-Site Reverse Osmosis System</u>	<u>750,000</u>	<u>Utility</u>
<u>30</u>	<u>20240 Spence Rd</u>	<u>1,174</u>	<u>Septic</u>	<u>267,398</u>	<u>Utility</u>
<u>31</u>	<u>2340 Alisal Rd</u>	<u>7,500</u>	<u>Septic</u>	<u>1,000,000</u>	<u>Utility and generator</u>



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<u>32</u>	<u>27020 Encinal Rd</u>	<u>66,728</u>	<u>Septic</u>	<u>68,588</u>	<u>Utility</u>
<u>33</u>	<u>370 Espinosa Rd</u>	<u>65,616</u>	<u>Septic</u>	<u>516,718</u>	<u>Utility</u>
<u>34</u>	<u>360 Espinosa Rd</u>	<u>28,163</u>	<u>Septic</u>	<u>1,418,184</u>	<u>Utility</u>
<u>35</u>	<u>27040 Encinal Rd</u>	<u>72,312</u>	<u>Septic</u>	<u>78,1448</u>	<u>Utility</u>
<u>36</u>	<u>23640 Potter Rd</u>	<u>45,000</u>	<u>Septic</u>	<u>623,597</u>	<u>Utility</u>
<u>37</u>	<u>22730 Fuji Ln</u>	<u>3,342</u>	<u>Septic</u>	<u>949,500</u>	<u>Utility</u>
<u>38</u>	<u>398 Natividad Rd, #A</u>	<u>643</u>	<u>Septic</u>	<u>0</u>	<u>Utility</u>
<u>39</u>	<u>20200 Spence Rd</u>	<u>45,000</u>	<u>Septic</u>	<u>92,000</u>	<u>Utility</u>
<u>40</u>	<u>22900 Fuji Ln</u>	<u>N/A</u>	<u>Septic</u>	<u>1</u>	<u>Utility</u>
<u>41</u>	<u>23700 Potter Rd</u>	<u>700</u>	<u>Septic</u>	<u>265,376</u>	<u>Utility</u>
<u>42</u>	<u>1230 River Rd</u>	<u>0.5</u>	<u>Septic</u>	<u>1,000</u>	<u>Utility and solar</u>
<u>43</u>	<u>26100 Old Stage Rd</u>	<u>300</u>	<u>Septic</u>	<u>8,220</u>	<u>Utility</u>
<u>44</u>	<u>564 River Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>45</u>	<u>2378 Alisal Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

*Notes: N/A = not available/unknown*

**Table 4 Proposed Utilities Improvements**

<u>Site Number</u>	<u>Address</u>	<u>New Wells</u>	<u>Water Storage Tanks</u>	<u>Irrigation</u>	<u>Waste-water</u>	<u>Bathrooms</u>	<u>Washing Facilities</u>	<u>Electric Utility</u>	<u>Roads</u>	<u>Parking</u>	<u>Fencing</u>	<u>Other</u>
<u>1</u>	<u>22785 Fuji Ln</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes, 4,000 amps</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>2</u>	<u>22750 Fuji Ln</u>	<u>No</u>	<u>Yes, 30,000 gallons</u>	<u>Yes, new system</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>Yes, fire access road</u>	<u>New paved parking, 25 spaces, no EV</u>	<u>Partial</u>	<u>Increase natural gas service</u>
<u>3</u>	<u>22835 Fuji Ln</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>4</u>	<u>23760 Potter Rd</u>	<u>No</u>	<u>Yes</u>	<u>Yes, new drip</u>	<u>No</u>	<u>Yes, 6-8</u>	<u>Yes, 6-8</u>	<u>Yes, 4,000 amps</u>	<u>Yes, fire access</u>	<u>Yes, 120 spaces</u>	<u>Yes, perimeter</u>	<u>Rebuild greenhouses</u>
<u>5</u>	<u>23940 Potter Rd</u>	<u>N/A</u>	<u>Yes, 50,000 gallons</u>	<u>N/A</u>	<u>N/A</u>	<u>No, 3 existing</u>	<u>No, 3 existing</u>	<u>N/A</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>6</u>	<u>20180 Spence Rd</u>	<u>No</u>	<u>unknown</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Power upgrade</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Rehabilitate 68,000-sf greenhouses</u>
<u>7</u>	<u>25950 Encinal Rd</u>	<u>No</u>	<u>Yes, 50,000 gallons</u>	<u>Yes, new drip</u>	<u>No</u>	<u>Yes, 1</u>	<u>Yes, 1</u>	<u>Yes, 400 amp</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Greenhouse rehabilitation</u>
<u>8</u>	<u>26000 Encinal Rd</u>	<u>*data combined with 25950 Encinal Rd (above)</u>										
<u>9</u>	<u>50 Zabala Rd</u>	<u>No</u>	<u>Yes, 70,000 gallons</u>	<u>As needed</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes, 8,000 amp 480v upgrade</u>	<u>Yes, fire access</u>	<u>No, 58 spaces, no EV</u>	<u>Yes, extend fence for fire lane and site access</u>	<u>Encroachment permit; lighting</u>
<u>10</u>	<u>22790 Fuji Ln</u>	<u>No</u>	<u>No</u>	<u>Yes, new holding tanks</u>	<u>No</u>	<u>2</u>	<u>Yes, 2</u>	<u>No</u>	<u>No</u>	<u>25 new spaces</u>	<u>Yes, for 14 acres</u>	<u>No</u>
<u>11</u>	<u>26900 Encinal Rd</u>	<u>No</u>	<u>Yes, 40,000 gallons</u>	<u>No</u>	<u>No</u>	<u>Yes, 2</u>	<u>Yes, 2</u>	<u>Yes, 400 amp</u>	<u>Yes, fire access</u>	<u>Yes, 15 spaces</u>	<u>No</u>	<u>3 greenhouses and 10,000-square foot building</u>
<u>12</u>	<u>18 Hartnell Rd</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

County of Monterey  
**Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County**

<u>Site Number</u>	<u>Address</u>	<u>New Wells</u>	<u>Water Storage Tanks</u>	<u>Irrigation</u>	<u>Waste-water</u>	<u>Bathrooms</u>	<u>Washing Facilities</u>	<u>Electric Utility</u>	<u>Roads</u>	<u>Parking</u>	<u>Fencing</u>	<u>Other</u>
13	2272 Alisal Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
14	25600 Encinal Rd	No	Yes, 48,800 gallons	No	No	No	No	Yes, 3,000 amp	New paving	No	No	No
15	20420 Spence Rd	Yes, 1 new	Yes, two 65,000 gallon tanks	Yes	N/A	Yes, 1	N/A	Yes, power upgrade	N/A	No	No	Fire sprinkler upgrade
16	20510 Spence Rd	No	Yes, 100,000 gallons	Yes, replace pump	No	Yes, 2	No	Yes, minor upgrades	No	10 spaces	3,000,000 linear feet	No
17	23820 Potter Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
18	2338 Alisal Rd	No	Yes, 40,000 gallons	Yes, new drip	No	Yes, 8 stalls	No	Yes, 4,000 amps	Yes, second entrance	68 spaces	Yes, new fence and gate	No
19	26500 Encinal Rd	No	Yes, 120,000 gallons	Yes, new lines	No	No	No	No	No	No	Yes, back fence	Fire sprinkler upgrade
20	20800 Spence Rd	No	No	No	No	No	No	No	No	No	No	No
21	25700 Encinal Rd	No	No	No	No	Yes, 3	Yes, 3	N/A	N/A	Yes, 26 new spaces	No	Rehabilitate 5,000-square feet
22	20954 Spence Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
23	2262 Alisal Rd	No	No	No	No	Yes	No	Yes, two 4,000-amp transformers, new electrical panels	Yes, fire access	No, 50 spaces, no EV	No	Retrofit Greenhouse 1, remodel DISTRO building, modify dry room
24	20400 Spence Rd	No	No		No	Yes	Yes, new showers	Yes, two 4,000-amp transformers, new electrical panels	Yes, fire access	55 spaces, no EV, new dirt parking area	No	Remove old residence

County of Monterey  
**Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County**

<u>Site Number</u>	<u>Address</u>	<u>New Wells</u>	<u>Water Storage Tanks</u>	<u>Irrigation</u>	<u>Waste-water</u>	<u>Bathrooms</u>	<u>Washing Facilities</u>	<u>Electric Utility</u>	<u>Roads</u>	<u>Parking</u>	<u>Fencing</u>	<u>Other</u>
<u>25</u>	<u>26800 Encinal Rd</u>	<u>No</u>	<u>Yes, 45,000 gallons</u>	<u>Yes, new drip</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>Yes, upgrade</u>	<u>No</u>	<u>No, 54 spaces, no EV</u>	<u>Yes, new security fencing</u>	<u>Rebuild two greenhouses and a warehouse to prior existing square footage</u>
<u>26</u>	<u>2242 Alisal Rd</u>	<u>No</u>	<u>Yes, 80,000 gallons</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>Yes, upgrade</u>	<u>Yes, add base rock</u>	<u>Yes, 72 spaces improved with base rock</u>	<u>No</u>	<u>Expand processor building by 10,000 sf</u>
<u>27</u>	<u>20220 Spence Rd</u>	<u>No</u>	<u>Yes, 50,000 gallons</u>	<u>Yes, new drip</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>Yes, improve access roads</u>	<u>Yes, 35 spaces</u>	<u>Yes, front and back</u>	<u>No</u>
<u>28</u>	<u>26889 Encinal Rd</u>	<u>No</u>	<u>Yes, 65,000 gallons</u>	<u>No</u>	<u>Yes (new septic to bathrooms )</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes, two 4,000 amp panels</u>	<u>Yes, fire access</u>	<u>Yes, 193 spaces, 3 electric</u>	<u>Yes, replace/repair fencing</u>	<u>New and upgraded gas line</u>
<u>29</u>	<u>20260 Spence Rd</u>	<u>No</u>	<u>Yes, 4</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>Yes, fire access</u>	<u>No, 60 spaces, no EV</u>	<u>No</u>	<u>New dry room facility</u>
<u>30</u>	<u>20240 Spence Rd</u>	<u>No</u>	<u>Yes, 75,000 gallons</u>	<u>Yes, new drip</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes, 6,000 amp</u>	<u>Yes, fire access</u>	<u>Yes, improve ADA space; 24 spaces; no EV.</u>	<u>New security fence added 2017</u>	<u>Replace 2 greenhouses destroyed by storm</u>
<u>31</u>	<u>2340 Alisal Rd</u>	<u>No</u>	<u>Yes, 75,000 gallons</u>	<u>Yes, new drip</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes, 8,000 amps</u>	<u>Yes, fire access</u>	<u>Yes, improve ADA spaces, 53 spaces, no EV</u>	<u>Perimeter security fence installed</u>	<u>New greenhouses and service buildings</u>
<u>32</u>	<u>27020 Encinal Rd</u>	<u>No</u>	<u>Yes, 60,000 gallons</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes, 4,000 amps</u>	<u>Yes, fire access</u>	<u>Yes, improve ADA space, 43 spaces, no EV</u>	<u>Yes, security fencing</u>	<u>No</u>
<u>33</u>	<u>370 Espinosa Rd</u>	<u>No</u>	<u>Yes, 120,000 gallons</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>Yes, increase to 12,000 amps</u>	<u>No</u>	<u>Yes, partial resurfacing,</u>	<u>Yes, security fencing</u>	<u>No</u>

County of Monterey  
**Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County**

<u>Site Number</u>	<u>Address</u>	<u>New Wells</u>	<u>Water Storage Tanks</u>	<u>Irrigation</u>	<u>Waste-water</u>	<u>Bathrooms</u>	<u>Washing Facilities</u>	<u>Electric Utility</u>	<u>Roads</u>	<u>Parking</u>	<u>Fencing</u>	<u>Other</u>
										168 spaces, no EV		
34	360 Espinosa Rd	No	Yes, 120,000 gallons	No	No	No	No, using existing	Yes, increase to 16,000 amps	No	Yes, partial resurfacing, 68 spaces, no EV	Yes, security fencing	No
35	27040 Encinal Rd	No	Yes, 60,000 gallons	No	No	No	No	Yes, 12,000 amps	Yes, all weather fire access road	Yes, improve ADA space, 33 spaces, no EV	Yes, security fencing	No
36	23640 Potter Rd	No	No	No	Yes	No	No	Yes	Yes, all weather fire access road; culvert & driveway improvements within road ROW	No, 19 spaces, no EV	No	No
37	22730 Fuji Ln	No	Yes, 41,000 gallons	Yes, upgrade low-flow system	No	No	No	Yes, upgrade to 1,600 amps, 277/480 volts, transformer	Yes, fire access	No, 55 spaces, no EV	No	Stormwater retention pond, fire prevention system improvements
38	398 Natividad Rd, #A	No	Yes, 40,000 gallons	No	Yes	No	Yes	Yes	Yes, fire access	No, 43 spaces, no EV	No	No
39	20200 Spence Rd	No	Yes, 30,000 gallons	Yes, new system	No	No	Yes	Yes, two 4,000 amp	Yes, fire access	No, 35 spaces, no EV	No	New gas line and fire sprinklers for metal buildings
40	22900 Fuji Ln	No	Yes, 1 tank	Yes, drip irrigation	No	No	No	Yes	Yes, upgrade access roads with compacted base rock and dust control	Yes, 30 spaces	Yes, front and back	N/A
41	23700 Potter Rd	No	Yes, five new	No	No	Yes	No	No	Yes, access road	Yes, 18 spaces	No	Add photovoltaic array to supply

County of Monterey  
**Multiple Cannabis Cultivation Facilities in Unincorporated Monterey County**

<u>Site Number</u>	<u>Address</u>	<u>New Wells</u>	<u>Water Storage Tanks</u>	<u>Irrigation</u>	<u>Waste-water</u>	<u>Bathrooms</u>	<u>Washing Facilities</u>	<u>Electric Utility</u>	<u>Roads</u>	<u>Parking</u>	<u>Fencing</u>	<u>Other</u>
			10,500-gallon tanks									50% of the power needed for the nursery and processing in the packing house
42	1230 River Rd	No	Yes, 500 gallons	No	No	No	No	No	No	No, 2 spaces, no EV	Yes, front of building	N/A
43	26100 Old Stage Rd	No	Yes, 10,000 gallons	Yes, drip irrigation	No	No	No	Yes, upgrade power	Yes, fire access	Yes, improve ADA space, 12 spaces, no EV	Yes, around building	Pave property entrance
44	564 River Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
45	2378 Alisal Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

*Notes: N/A = not available/unknown*

Page 22, Solid Waste:

On-site composting is possible but not required for the project sites; most green waste would be hauled and disposed of offsite, for composting at the landfill. The County does not allow for burning of cannabis waste on the project sites.

Page 22, Environmental Setting:

The remaining ~~eight-14~~ facilities are not currently operational with licensed commercial cannabis, although they are in the process of obtaining licenses. Currently, these remaining ~~eight-14~~ facilities are operational for floral, spice, herb, and vegetable production or are not in use.

Page 24, Analysis Baseline:

One site has been cultivating cannabis since 2017 when MAUCRSA was passed. The remaining 20 sites are assumed to have been cultivating cannabis since approximately 2017. Fourteen sites (14) have not been previously cultivating cannabis.

Page 24-25, B. Other Public Agencies Whose Approval May be Required:

California Department of Food and Agriculture (CalCannabis)

- State Cannabis License

Department of Public Health (Manufactured Cannabis Safety Branch (MCSB))

- On-site Wastewater Treatment System Permit

County of Monterey

- Commercial Cannabis Business Permit
- Cannabis Use Permit
- Coastal Development Permit

Bureau of Cannabis Control (Distribution)

- Cannabis Distribution Permit

California State Water Resources Control Board (SWRCB)

- NPDES Construction General Permit
- Cannabis General Order

California Department of Fish & Wildlife (DFW)

- Lake and Streambed Alteration
- Incidental Take Statement or Incidental Take Permit

Monterey Bay Air Resources District (MBARD)

- Authority to Construct, if required
- Permit to Operate, if required

Page 36, Aesthetics 1(c) – Less than Significant:

Should any sites require demolition of rebuilding in the future, additional CEQA review may be required when such activities are proposed. The rebuilding of previously existing greenhouses would not be considered a substantial change in the visual character of the site, as this modification would essentially revert the site to a previous visual state. Additionally, the demolition of existing buildings and structures would similarly revert the site to a previous visual state of undeveloped land.

Page 41, Construction:

Although the cannabis operations would primarily use existing greenhouses or buildings, or would perform minor retrofit work that would not be anticipated to require heavy construction equipment, some The projects would not may also require demolition of existing facilities or to allow for construction of new facilities, since the cannabis operations would use existing greenhouses or buildings. The amount of demolition and construction that would be performed is unknown at this stage of permitting. For a conservative modeling analysis, it was assumed that demolition and construction would occur on approximately 25 percent of all existing square footage. Default construction equipment in CalEEMod was assumed. Minor greenhouse retrofit work may occur at the existing facilities to convert the operations; however, this work would not be anticipated to require heavy construction equipment or activities such as grading. This work would be similar to existing maintenance and upkeep of the previous uses on site, and therefore these emissions are accounted for in the region. In addition, the duration of such activities would be temporary.

Page 41-42, Operation:

The square footage for the cultivation, processing, distribution, and manufacturing activities are shown below in Table 5Table 3.... These buildout areas were inputted into CalEEMod as shown in Table 5Table 3.

**Table 53 CalEEMod Land Use Inputs**

Page 42, Operation:

No fireplaces would be associated with any of the proposed uses, and the County does not allow the burning of cannabis waste on the project sites.

Page 45, Significance Thresholds:

Based on criteria set forth in MBARD’s CEQA Air Quality Guidelines (Source: IX.15), the project’s impacts on criteria air pollution would be significant if the project would result in air pollutant emissions during construction or operation that exceed the thresholds in Table 6Table 4.

**Table 64 Air Quality Thresholds of Significance**

Page 46, Air Quality 3(a) – Less than Significant:

Given the project s.f. listed in Table 5Table 3, the project is estimated to have approximately 14,521 employees.



Page 47, Air Quality 3(b) – Less than Significant; Construction:

~~With the conservative assumption that demolition and construction would occur on approximately 25 percent of all square footage, the project’s PM<sub>10</sub> emissions would reach as high as 19 pounds per day, which would not exceed the 82 pounds per day threshold (see Appendix A for model outputs). The project would not require demolition of existing facilities or construction of new facilities, as the cannabis operations would use existing greenhouses or buildings. Minor retrofit work may occur at the existing facilities to convert the operations; however, this work would not be anticipated to require heavy construction equipment or activities such as grading. This work would be similar to existing maintenance and upkeep of the previous uses on site, and therefore these emissions are accounted for in the region. In addition, the duration of such activities would be temporary. Therefore, construction emissions would be similar to existing uses and part of typical maintenance and upkeep of an agricultural facility, and Therefore, construction emissions would be less than significant.~~

Page 47-48, Air Quality 3(b) – Less than Significant; Operation:

~~Table 7~~Table 5 presents the existing operational criteria pollutant emissions for the cut flower operations and project operational criteria pollutant emissions for the cannabis cultivation operations, including the net change in emissions from cannabis operations....

**Table 7 Existing and Project Criteria Pollutant Emissions**

Page 49, Air Quality 3(c) – Less than Significant; Construction:

~~While overall project construction would occur over a longer timeframe, the typical construction work associated with an individual site would be anticipated to be approximately one year given the level of construction work needed to demolish and construct greenhouses and/or manufacturing buildings. In addition, some sites would use existing facilities or As stated above, project construction would only include retrofit work to upgrade existing greenhouses and accessory structures that would occur over a shorter timeframe. Therefore, DPM generated by the project this minor and temporary work is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual.~~

Page 50, Air Quality 3(c) – Less than Significant; Generators:

These regulations also require renewable energy requirements for all indoor tier 2 mixed-light and nurseries using indoor tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity meets the average greenhouse gas emissions intensity required by their local utility provider pursuant to the California Renewables Portfolio Standard Program, beginning January 1, 2023. Additionally, portable equipment may be subject to regulation by MBARD, which requires a permit to operate be obtained for stationary equipment such as generators, hash oil processing, and boilers greater than 2 MMBTU/hour for natural gas or 250,000 BTU/hour for other fuels. MBARD also requires an Authority to Construct and Permit to Operate be obtained for odor control devices, fume hoods, and engine generator sets.

Page 50, Air Quality 3(d) – Less than Significant:

In addition, per Monterey County Code Section 7.90.100.A.16, the facilities must provide a contact that the public can reach to provide notice of issues with the cannabis operation, including odors.

Page 55, Electricity and Natural Gas:

~~Table 8~~~~Table 6~~ and ~~Table 9~~~~Table 7~~ show the electricity and natural gas consumption by sector and total for PG&E.

**Table 86 Electricity Consumption in the PG&E Service Area in 2018**

...

**Table 97 Natural Gas Consumption in PG&E Service Area in 2018**

Page 56-57, Energy 6(a) – Less Than Significant; Construction Energy Demand:

Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction activities would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of 13 California Code of Regulations (CCR) Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes to minimize unnecessary fuel consumption. Construction equipment would also be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard (40 Code of Federal Regulations [CFR] Parts 1039, 1065, and 1068), which would minimize inefficient fuel consumption. Therefore, project construction would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant. The project would not require demolition of existing facilities or construction of new facilities, as the cannabis operations would use existing greenhouses or buildings. Minor greenhouse retrofit work may occur at the greenhouses or buildings to convert the operations; however, this work would not be anticipated to require heavy construction equipment or activities such as grading. This work would be similar to existing maintenance and upkeep of the previous uses on site, and therefore these emissions are accounted for in the region. In addition, the duration of such activities would be temporary. Therefore, the construction energy demand would be similar to existing uses and part of typical maintenance and upkeep of an agricultural facility, and would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Page 57-58, Energy 6(a) – Less Than Significant; Operational Energy Demand:

Table 10~~Table 8~~ shows the estimated total annual fuel consumption for existing operations, project operations, and the net change from existing operations to project operations using the estimated VMT with the assumed vehicle fleet mix (Appendix A).

**Table 108 Existing and Project Annual Transportation Energy Consumption**

Page 62, Section VI.7:

**Discussion/Conclusion/Mitigation:**

Page 68, Construction:

With the conservative assumption that demolition and construction would occur for approximately 25 percent of all square footage, the project’s construction GHG emissions would total 5,881 MT CO<sub>2</sub>e. Amortized over the potential lifetime of the project, a 30-year period, this would result in yearly GHG emissions of 196 MT CO<sub>2</sub>e. The project would not require demolition of existing greenhouses or construction of new facilities, as the cannabis operations would use existing greenhouses or buildings. Minor retrofit work may occur at the greenhouses or buildings to convert the operations; however, this work would not be anticipated to require heavy construction equipment or activities such as grading for foundations. This work would be similar to existing maintenance and upkeep of the previous agricultural uses on each site, and therefore these emissions are accounted for in the region. Therefore, construction GHG emissions would be similar to existing emissions and part of typical maintenance and upkeep of an agricultural facility and would be *less than significant*.

Page 68-69, *Operation* (revised table rows only):

Table 11~~Table 9~~ presents the existing GHG emissions for the prior cut flower operations and project GHG emissions (including construction) for the cannabis cultivation operations, including the net change in GHG emissions from cannabis operations....

**Table 11**~~9~~ Existing and Project Greenhouse Gas Emissions

Sources	CO <sub>2</sub> e (MT per year)
<b>Proposed</b>	
<u>Construction</u>	<u>2,624</u>
Proposed Total	17,404 <u>20,118</u>
<b>Net Change from Existing to Proposed</b>	
<u>Construction</u>	<u>196</u>
Net Change Total	1,436 <u>1,632</u>

Page 70, *Operation*:

As shown in Table 11~~Table 9~~, the project’s emissions of would be 0.1 MT CO<sub>2</sub>e per SP per year, well below the 4.9 MT CO<sub>2</sub>e per SP per year threshold.

Page 73, Hazards and Hazardous Materials 9 (a-b) – Less than Significant:

The Resource Conservation and Recovery Act (RCRA) also established hazardous waste disposal requirements; please refer to 40 CFR parts 260 through 273. Any removal of building materials that may contain asbestos would be conducted in compliance with MBARD Rule 424 and USEPA asbestos regulations.

Page 74, Hazards and Hazardous Materials 9(d) – Less Than Significant Impact:

These sites are listed in Table 12~~Table 10~~, below.

**Table 12~~10~~ Geotracker Irrigated Lands Regulatory Sites**

Page 80, Hydrology and Water Quality 10(e) – No Impact:

The proposed project is located primarily within the East Side Aquifer Subbasin, with ~~two~~ four project sites located within the 180/400 Foot Aquifer Subbasin which is managed per the direction of a GSP adopted by the Salinas Valley Groundwater Basin GSA on January 9, 2020.

Page 87-88, Regulatory Framework; Noise:

The Monterey County Code, Chapter 10.60 *Noise Control*, describes the allowances as well as the restrictions related to noise. Section 10.60.030 states that at any time of the day, it is prohibited within the unincorporated area of the County of Monterey to operate, assist in operating, allow, or cause to be operated any machine, mechanism, device, or contrivance which produces a noise level that exceeds 85 dBA at 50 feet. This does not apply if the equipment is operated in excess of 2,500 feet from any occupied dwelling unit. This would apply to construction equipment.

The County’s noise level standards are summarized in Table 13~~Table 11~~ and Table 14~~Table 12~~. Table 13~~Table 11~~ shows the County Code standards for exterior noise. Table 14~~Table 12~~ shows the County Land Use Element standards, which define “acceptable” noise level for land use compatibility (Source: IX.51).

**Table 13~~11~~ County of Monterey Exterior Noise Level Standards**

Zone	Time	Noise Level Standard (L <sub>eq</sub> dBA)	Maximum Level (dBA)
All	9:00 PM to 7:00 AM	45	65
Within 500 feet of a noise sensitive land use	10:00 PM to 7:00 AM (Monday through Saturday)	Not to exceed “acceptable” levels <sup>1</sup>	-
	All day Sunday		
	All day Holidays		

Notes:

1. See Table 14~~Table 12~~ for “acceptable” noise levels

Source: IX.51

**Table 14~~12~~ Land Use Compatibility for Noise Environments**

Page 89, Noise 13(a) – Less than Significant; Construction Noise:

Although most cannabis operations would use existing greenhouses or buildings, or would perform minor retrofit work that would not be anticipated to require heavy construction equipment, up to 25 percent of the project sites may also require demolition of existing greenhouses to allow for construction of new greenhouses. Typical equipment used for these activities would include dozers and cranes. Calculation noise levels using the Roadway Construction Noise Model (RCNM), a dozer and a crane would generate a noise level of 79 dBA L<sub>eq</sub> at 50 feet, which would not exceed the County’s 85 dBA at 50 feet

~~threshold. The project would not require demolition of existing facilities or construction of new facilities, as the cannabis operations would use existing greenhouses. In addition, project sites would potentially use existing facilities or perform minor retrofit work that would result in lower noise levels. may occur at the greenhouses to convert the operations; however, this work would not be anticipated to require heavy construction equipment over long periods of time. Moreover, all of the sites are surrounded by other agricultural activity as opposed to sensitive receptor uses, such as residential, park, and school uses that are more sensitive to noise impacts. In addition, the duration of such activities would be temporary. Therefore, construction noise impacts would be *less than significant*.~~

Page 90, Noise 13(b) – Less than Significant:

Vibration-sensitive land uses would include residential structures located on adjacent agricultural properties. Construction equipment used to demolish or construct project greenhouses may include a dozer, which generates a vibration level of 80 VdB at 50 feet. Per FTA guidance, 85 VdB is acceptable if there are an infrequent number of events per day. During a typical construction day, a dozer would move across the project site and would be near off-site structures for an infrequent portion of the day. Therefore, with a vibration level of 80 VdB, project vibration levels would not exceed 85 VdB. In addition, Pproject site improvements would potentially not include heavy equipment and would instead involve minor retrofitting of existing greenhouses; this work would not be anticipated to require heavy construction equipment that would generate noticeable vibration to on or off-site residences, and vibration levels would be lower than the 72 VdB threshold for residences and buildings where people normally sleep. In addition, the duration of such activities would be temporary. Project operation would not use substantial vibration-generating equipment. Therefore, the project construction would generate minor vibration levels that would not create a significant impact to offsite vibration-sensitive land uses, the impact would be *less than significant*.

Page 95, Transportation 17(a-b) – Less than Significant with Mitigation Incorporated:

Under near-term plus project conditions, the project would degrade one intersection listed in ~~Table 15~~~~Table 13~~ to unacceptable LOS E or worse and contribute to three already impacted intersections. Cumulative LOS impacts from the project to intersections and roadway segments would occur at ten intersections and three roadway segments listed in ~~Table 16~~~~Table 14~~. Reduction in LOS operations at intersections and roadway segments in the project vicinity would result in a potentially significant impact.

**Table ~~15~~~~13~~: Near-Term Plus Project: Impacted Intersections and Roadway Segments**

...

**Table ~~16~~~~14~~: Cumulative Plus Project: Impacted Intersections and Roadway Segments**

Page 103, Utilities and Service Systems 19(a) – Less than Significant:

Based on the above discussion, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities not included as part of the

project, the construction or relocation of which could cause significant environmental effects.

Page 109, Mandatory Findings of Significance VII (b) – Less than Significant with Mitigation Incorporated:

There are 17 applications for cannabis use permits on sites located within five miles of the 45 project sites. Of these 17 sites, two are approved, five are under condition compliance, six are undergoing review, one was withdrawn, one was appealed, and two remain incomplete. Therefore, 15 cannabis cultivation sites are considered cumulative cannabis projects in the vicinity of the 45 sites (the 17 applications, excluding those that have been withdrawn or appealed).

The proposed project was determined to have no impact related to Population and Housing, Public Services, Recreation, and Wildfire. Therefore, as there would be no direct or indirect impacts, the proposed project would not contribute to cumulative impacts to these issue areas.

For all other issue areas, the proposed project would have either direct or indirect impacts that have been determined to be less than significant, with or without mitigation incorporated. The project would not adversely affect biological, cultural, or other physical resources outside of the project sites. Other impacts, such as noise and GHG emissions, would be minor and would not be cumulatively considerable. Thus, the effects of the project would not combine with impacts from other projects in the vicinity, including nearby existing and proposed cannabis cultivation sites, to result in a significant cumulative impact.

As discussed in Section ~~16~~17, *Transportation*, the project would result in impacts to four intersections and one roadway segment under near-term plus project conditions and impacts to ten intersections and three roadway segments under cumulative plus project conditions. Mitigation Measures TRA-1, TRA-2, and TRA-3 are~~is~~ required to reduce project impacts, including installation and optimization of traffic signals, acceleration lanes, and payment of impact fees and the fair share costs associated with each project's contribution to the cumulative impacts. Traffic from nearby existing cannabis cultivation sites was included in the existing traffic counts, and future cannabis cultivation sites near the project sites would be required to pay a similar traffic impact fee for increased trips at those intersections. Impacts would be *less than significant with mitigation incorporated*.

Page 116, X. Attachments:

CalEEMod Results (Appendix A)

Traffic Impact Study (Appendix B)

County Cannabis CEQA Consistency Checklist (Appendix C)

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