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CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
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June 20, 2016

Craig Spencer
Monterey County Resource Management Agency
128 West Alisal Street, Second Floor
Salinas, CA 93901

Subject: Negative Declaration for Medical Marijuana Regulations for the County of Monterey, Planning File Number REF150048

Dear Mr. Spencer:

Thank you for forwarding the Negative Declaration for Medical Marijuana Regulations for the County of Monterey to our office. The proposed ordinance would amend Title 20 of the Monterey County Code, part of the Local Coastal Program's (LCP) Implementation Plan (IP), to allow medical marijuana activities in certain zoning districts throughout the unincorporated areas of the County, including within the coastal zone, subject to the requirement to obtain a coastal development permit. As we understand it, indoor medical marijuana cultivation and manufacturing would be allowed in areas zoned Agricultural Industrial, Light Industrial, Heavy Industrial, and within existing legally permitted greenhouses in Coastal Agricultural Preserve. Medical marijuana dispensaries would be allowed within areas zoned Coastal General Commercial. The standard of review for IP amendments is that such amendments must conform with and carry out the policies of the Land Use Plan. We support the County's effort to specifically address the issue of medical marijuana activities and offer the following comments.

First, we consider medical marijuana cultivation to be an agricultural use. That said, medical marijuana cultivation and sale does not constitute a coastal-dependent industrial use and is therefore not an appropriate use for sites designated for coastal-dependent industrial uses in the North County Land Use Plan. Thus we recommend that the ordinance specifically state that medical marijuana activities are not allowed in areas designated for coastal-dependent industrial uses.

Second, the Negative Declaration states that permit applicants within the coastal zone must demonstrate that a medical marijuana project's water demand be consistent with all LCP water supply policies, and that any increased water demand will not lead to significant environmental impacts. However, the proposed ordinance language does not specifically include these required findings. We suggest adding language in the proposed ordinance to require all medical marijuana facilities to include a finding of consistency with LCP water supply policies for all coastal development permits.

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Thank you for considering our comments. If you have any questions or would like to discuss these issues further, please contact me at (831) 427-4863 or Brian.O'Neill@coastal.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "B. O'Neill", with a stylized, cursive script.

Brian O'Neill
Coastal Planner