

Planning Coalition outlines flaws with cannabis draft EIR

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The Calaveras Planning Coalition submitted comments on the Draft Environmental Impact Report for the Medical Cannabis Cultivation and Commerce Ordinance Report on June 14.

This 45-page document responds to the DEIR for commercial cannabis cultivation within Calaveras County. The comment's cover letter explains the summary of improvements needed in the final EIR, the need to have "both/and" not "either/or" choices on banning and regulation, zoning answers, conditions on use permits, and feasible mitigation measures.

The CPC is a partnership of member organizations and individuals that has been working for the past decade to promote robust, democratic public participation in sensible land use and resource planning.

The group seeks to ensure a healthy, natural, and economic environment as it pertains to environmental protection and preservation of cultural and historic resources, while providing room for sustainable economic growth.

Individual group volunteers submitted comments on several topics including aesthetics, air quality and greenhouse gas emissions, biological resources, hydrology and water quality, land use planning, noise, and traffic. There were also various alternatives suggested to mitigate these issues.

The comment calls on the county to include other public lands in their listed "County-designated scenic resources." These lands would include New Hogan Reservoir, the Arnold Rim Trail, BLM lands, New Melones Reservoir, and other public lands.

The comment also addresses the significant visual impact on the aesthetic of the surrounding environment and blight from cannabis-related construction (i.e. screen fencing and hoop houses). Several suggested mitigation measures were listed to address this.

In addressing air quality and greenhouse gas emissions, the comment notes that there are significant GHG implications of soil disturbance. Construction and operation of grows under the proposed ordinance would result in an increase in GHG emissions. In terms of air quality, exposure of people to objectionable odors needs to be addressed and mitigated.

In considering protection of biological resources, the comment notes that the current mitigation measures for minimum lot size and cultivation permits are inadequate. The limited county resources in inspecting and enforcing mitigations listed in the DEIR only creates theoretical compliance, not actual compliance.

In addition, the adverse effects of chemicals used in commercial cannabis operations need to be explained, as well as how they compare to other agricultural endeavors within the county, such as almonds and grapes.

In addressing hydrology and water quality, the comment notes that the proposed regulatory actions are inadequate. NOI applications to the water board are numerous and overwhelming, making it extremely difficult to inspect and enforce any regulatory actions. There are also issues of impact on the local groundwater supply that need to be addressed.

The DEIR's proposed ordinance in terms of land use is incredibly flawed. The impacts on communities include division of existing communities, conflicts with the Calaveras County General Plan, general land use chapter conflicts, and zoning land use conversions and conflicts. If not addressed, the impacts would be disastrous. The comment provides detailed information and mitigations to address these concerns.

The comment notes that there are long-term non-transportation operation noise impacts, as well as long-term traffic noise levels. There are specific mitigations provided to lessen the noise impact.

The county must also address the traffic impact on commercial cannabis cultivation and provide documentation of traffic mitigation. Noted were planned transportation improvements, cost and maintenance of county roads, and existing bike and pedestrian facilities.

A full range of alternatives has been provided by the group for the county to consider and implement. These alternatives vary in how restrictive each one may be to the cannabis industry. The county is strongly urged to address these concerns in writing and to provide evidence of meaningful mitigation for all stated issues.

Read the full comments at www.calaverascap.com