

September 22, 2017

To: Matt Johnston
Re: Comments on Cannabis Draft EIR

Dear Matt,

The Draft EIR covers many topics well. My overall concern is with preventing the misuse of pesticides, herbicides and rodenticides that affect wildlife and water resources.

The strength of the EIR is in the Mitigation Measures.

I would recommend adding to the BIO Mitigation Measures the same MM that is listed under HYDRO 1.1, that is:

HYDRO

1.1. Pesticide, Herbicide, and Rodenticide Control.

Licensees shall submit information about any proposed use, storage, and application of pesticides and herbicides by type and amount as part of a Pest Management Plan (see MM BIO-1.1g) to be reviewed and approved as part of the licensing process. Cannabis cultivation on all licensed sites shall only use pesticides and herbicides that are exempt from residue tolerance requirements and either registered and labeled for a broad enough use to include use on cannabis or exempt from registration requirements as a minimum risk pesticide under Section 25(b) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the California Code of Regulations, title 3, section 6147. Any uses of pesticide or herbicide products shall be consistent with product labeling and any products on the site shall be placed, used, and stored in a manner that ensures that they will not enter or be released uncontrolled into the environment, including surface or ground waters.

The weakness is in the Secondary Impacts, which are consistently listed as Significant and Unavoidable.

In the Biological Resources section in the Executive Summary (Table ES 1) (page ES 10), for Secondary Impacts, it says: “MM AT 1.3a and MM AT 1.3b would apply”; However, in the Mitigation Monitoring and Reporting Program (Chapter 6), for Biological Resources there is no listing for mitigating Secondary Impacts. It seems that “MM AT 1.3a and MM AT 1.3b would apply” should be listed there.

Thank you.

Sam Earnshaw
PO Box 1766
Watsonville, CA 95077
831 722-5556