PLANNINGDIVISION

CITY OF TEMPLE CITY 9701 LAS TUNAS DR. TEMPLE CITY, CA 91780 (626) 285-2171

February 12, 2019

Betty Donavanik
11333 Valley Boulevard
El Monte, CA 91731

Re: El Monte Green Group, LLC *(Development Agreement No. 03-18, Medicinal Cannabis Conditional Use Permit Nos. 13-18, 14-18, and 15-18 & Development Agreement)*
Green Mountain Alliance, LLC *(Development Agreement No. 04-18, Medicinal Cannabis Conditional Use Permit Nos. 16-18, 17-18, and 18-18)*
9860, 9866, 9870, and 9874 Gidley Street

Dear Ms. Donavanik,

On January 28, 2019, the City of Temple City provided a letter, attached, detailing the City's concerns with the above-referenced projects. Temple City highlighted concerns related to the analysis in the Initial Study and Mitigated Negative Declaration. These included an insufficient project description; a failure to fully and correctly analyze impacts to public service, transportation and traffic, hazardous materials, and waste; and a failure to conduct a cumulative impact analysis that analyzes the full impact of this facility and other facilities being proposed.

As of today, we have not received a response to our concerns. The Planning Commission has recommended approval of the projects without making any revisions to the inadequate Initial Study and Mitigated Negative Declaration, or otherwise addressing Temple City's concerns. Please consider these concerns, as detailed in the attached letter, and request the environmental consultant to provide additional analysis as required by the California Environmental Quality Act prior to approving these projects.

Should you have any questions regarding this matter, please do not hesitate to contact me at (626) 285-2171, or sreimers@templecity.us.

Sincerely,

Scott Reimers
Planning Manager

PLANNINGDIVISION

CITY OF TEMPLE CITY 9701 LAS TUNAS DR. TEMPLE CITY, CA 91780 (626) 285-2171

January 28, 2019

Betty Donavanik
11333 Valley Boulevard
El Monte, CA 91731

Dear Ms. Donavanik,

Please find below comments on the El Monte Green Group, LLC and Green Mountain Alliance, LLC project. The project proposes to conduct commercial medicinal cannabis activities on a 4.9-acre site on Gidley Street.

The City is concerned about the mitigated negative declaration (MND) filed for the project as it raises significant concerns related to failure to consider environmental impacts of the project and conclusions unsupported by information in the MND. It also fails to consider the cumulative effect of this project as one of at least eight similar projects in proximity to this site, including but not limited to the recently approved project at 4400 Temple City Boulevard.

- The project description is insufficient because it lacks basic information about the project operations. For example, the MND discusses how the project involves commercial medicinal cannabis cultivation, and manufacturing using hazardous substances, and distribution operations, but does not provide any project-specific information, or even information from comparable operations, that will provide information concerning the amount of organic waste generated by the cultivation, how cannabis by-products will be disposed and in what quantities, the types of pesticides or hazardous substances commonly used, the risk of mishandling solvents and the potential impacts of such mishandling, or the types of anticipated deliveries from the site and the traffic impact of those deliveries. Without proper description of the project and its operations, it is difficult to provide any meaningful review of the project's impacts.

- The MND fails to disclose, analyze and mitigate significant impacts concerning public services, traffic/transportation, hazardous materials, and solid waste. Moreover, the MND includes no mention whatsoever of the project's significant cumulative impacts, particularly with respect to the multiple marijuana uses currently being processed by the City of El Monte for locations in proximity to the project. The project may have a significant impact on the environment and an EIR must be prepared.

- **Public Services**: The MND should at a minimum analyze whether the project will result in any changes in calls for service for the project site that would necessitate new or enhanced government facilities. But the MND does not provide any information regarding calls for service at existing projects of similar size and operational characteristics. There is no information regarding the project's operations, and it is not possible to analyze any changes to calls for service levels and its impacts. Further, all discussion of public service impacts focusses on El Monte Police and other El Monte services. Given the projects' location near the border of Temple City it may also impact Temple City services, most importantly police services provided by the Los Angeles County Sheriff's Department. However, the MND does not provide any analysis, data, or conclusions on the impact of this project on Temple City or the Sheriff's Department ability to provide public services.

- **Transportation and Traffic**: The project is serviced by Rowland Avenue which terminates into Temple City. The closest arterial roads are Lower Azusa Road and Baldwin Avenue. Lower Azusa Road is entirely within Temple City and Baldwin Avenue continues into Temple City. Therefore, a large percentage of the traffic from this project will be provided by roads within Temple City. Temple City was not consulted prior to or during the preparation of the traffic impact analysis and was not given the opportunity to provide any input on the intersections studied or the methodologies used. The MND does not contain data concerning uses related to cannabis cultivation and distribution using commercial vans. The traffic impact analysis instead relies on an over-simplified assumption about employee trip generation that does not accurately characterize employee travel behavior and ignores the additional daily trips that will be created by commercial delivery truck and vans. The lack of information or other studies on which these assumptions were made renders the conclusions of the MND suspect.

- **Hazardous Materials**: The MND fails to disclose a complete list of hazardous materials – pesticides, nutrients and corrosive chemicals - that will be used on site. The Mitigation Measures state that the applicant will identify and follow all legal requirements for their use. However, the MND cannot claim to have fully disclosed and addressed the project's impacts when vital information such as the chemicals and hazardous materials used is glaringly absent.

- **Waste**: There is no data provided concerning solid waste generated by this project. As such the MND fails to provide any information regarding the day-to-day operations of the Project. This renders the conclusion of no significant impacts to solid waste in excess of state or local standards, suspect.

- **Cumulative Impacts**: The MND fails to address how the City of El Monte has recently approved an application for a cannabis facility almost directly adjacent to the proposed project and is currently processing at least eight other applications that would allow for cannabis facilities within the immediate area of the proposed project. It does not state how these other facilities would interact to create cumulative impacts on the area and the residents living nearby. It is likely that the project will have a significant cumulative impact on the environment, particularly because there are at least eight projects currently being considered. Together these projects will generate the same or substantially similar environmental effects.

Should you have any questions regarding this matter, please do not hesitate to contact me at (626) 285-2171, or sreimers@templecity.us.

Sincerely,

Scott Reimers
Planning Manager