

**Cannabis EIR: Comparison of Proposals by Rincon and Ascent
Neighborhood Coalition Topline Comments
August 10, 2022**



SUMMARY

In response to Sonoma County’s RPF for a programmatic EIR to support a revised cannabis ordinance, two firms, Ascent Environmental and Rincon Consultants, provided proposals. The Neighborhood Coalition (NC) has reviewed these proposals and provides the following comments on key areas for your consideration. Based on both proposals as well as prior work experience of these companies, the NC recommends that you base your decision on work proposed and experience rather than only cost. Although the total proposal cost for Rincon is less than Ascent’s, it presumes a smaller work effort (1259 hours vs 2525 and 24 vs. 36 meetings with the County. Comparing actual EIR cannabis work experience, Ascent better understands the work effort involved.

Ascent outlines its experience of delivering quality EIR work on cannabis for Yolo, Trinity, Humboldt, and Calaveras Counties that led to successful completion and/or crafting of new cannabis ordinances, MNDs, EIRs and amendments. Ascent encourages the County to contact its prior clients for references.

In contrast, Rincon has NO experience in conducting a Cannabis Land Use Ordinance Programmatic EIR. Rincon highlights its work on the SMND for 2020-2021 Sonoma County Draft Cannabis Ordinance. Three key items:

- The work scope of an SMND is a small fraction of the work required for an EIR, and
- This SMND was challenged as inadequate by California Department of Fish and Wildlife, National Marine Fisheries Service, environmental groups, and the CEQA law firm Shute, Mihaly & Weinberger.
- The BOS concluded that Rincon’s SMND was insufficient to withstand a legal challenge. This resulted in a multi-year delay and additional costs to prepare an EIR.

Rincon’s lack of experience and its poor performance in the failed SMND, which was rife with inaccuracies and failed to support the proposed project, demonstrate its inadequate knowledge of CEQA. It likely doesn’t understand the full scope of the project, resulting in under budgeting and a low bid. Our environmental experts believe the level of work proposed by Ascent is essential for preparing a defensible EIR.

A poor EIR will invariably lead to lawsuits, additional expenses, and more delays in achieving a robust cannabis ordinance. The County has already experienced increased expenses and significant delays because of Rincon’s work on the SMND. Choosing Ascent, who has depth of experience in successfully completing four cannabis EIRs, would benefit the entire County including growers, neighbors, and taxpayers.

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As Ascent summarized (p. 6), the 2021 Yolo County EIR addressed many of the same issues that are hot points for Sonoma County: Visual character and lighting, cannabis as agricultural land use, odor, water use, and overconcentration (plus all the other required CEQA areas). The prior EIRs for Trinity, Humboldt and Calaveras Counties also addressed these topics. All EIRs successfully led to revised cannabis ordinances in those counties. Ascent has senior employees (ranging from 12-30 years' experience) in all these areas, plus experts in biological and natural resources, environment, transportation, air quality, noise, cultural resources, wildfire analysis, and project management. Notably, Ascent's proposal allocates 464 hours to technical studies and 1175 hours to administrative draft EIR, in contrast to only 138 hours and 575, respectively, allocated by Rincon.

Ascent has encouraged Sonoma County to contact its prior clients for references and we hope you will do so.

Rincon

Rincon's prior experience on cannabis CEQA issues was only working with Sonoma County in 2020-21 on a SMND to support Sonoma County's desire to expand cannabis cultivation and convert most applications to ministerial permits. The resulting SMND was woefully inadequate, glossing over many key elements required by CEQA and reaching conclusions contrary to what minimal facts they presented. The multiple deficiencies of that SMND were detailed in letters in March and May 2021, by the law firm Shute, Mihaly and Weinberger, to Sonoma County. As pointed out in these letters, it was obvious that the SMND failed to achieve the required CEQA analysis. The BOS rejected the SMND and the draft Chapter 38, instead voting to conduct a full programmatic EIR to support an updated cannabis ordinance. Incredibly Rincon presented its failed project as its example of its qualification to carry out the full EIR and ignored that this report was rejected by the County Board of Supervisors. See page 2 of Rincon's proposal:

The IS-MND was released for public review in 2020 and finalized in Spring 2021. At a public hearing in the Spring of 2021, the Sonoma County Board of Supervisors voted to amend the cannabis program and prepare a programmatic EIR for the updated regulations and program.

Rincon's statement further illustrates its lack of objective understanding of the CEQA requirements and EIR process.

Rincon's staff has less breadth and experience (4-20 years, several with only 4 years) and must rely on outside consultants for several areas. Its senior advisor, Jerry Hittleman, lacked knowledge of its

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SMND during the 2021 Sonoma County Planning Commission public hearings. Rincon's expertise in odor analysis is particularly lacking, as was evident in its 2021 SMND which contained no objective or scientific studies on odor.

Ascent's proposal provides a very detailed breakout of 26 categories being analyzed under the draft EIR section. In contrast, Rincon provided no details, which raises the question of whether it understands the project. Will Rincon cut corners to meet its budget? Will Rincon come back to County with a change order for additional funding? Has Rincon purposely or ignorantly low-balled the proposal in price and workload to attempt to secure the contract?

1. ODOR

Odor is a major issue for the revised cannabis ordinance that protects property rights of neighbors (including wineries) and maintains Sonoma County as a beautiful place enjoyed by both residents and visitors.

Ascent proposes advice on technical studies to quantitate odor and odor impacts, including what has worked for other counties, agencies, states and countries. Ascent proposes to both quantitatively and qualitatively evaluate potential odor impacts (pp. 22-23). Science-based methods are available to quantitate odor both close to and more distant from cultivation and processing sites. Utilizing such scientific methods will benefit growers, neighbors, and County staff.

Rincon, by contrast, only states that outdoor cultivation has more odor problems than indoor but does not mention studying quantitative methods of analysis or what has and has not worked for others (p. 28). Based on this lack of proposed in-depth analysis (consistent with what Rincon proposed on odor in the SMND), we do doubt Rincon would provide a comprehensive odor analysis that would support appropriate odor control measures.

2. WATER

Water availability is a major issue for Sonoma County, now in its third straight year of drought, with continued warmer and dryer conditions forecasted going forward due to climate change. Water analysis must consider current and future reduced water availability, accounting for all existing uses and projected needs (residential, agricultural, commercial/industrial as well as cannabis cultivation). In addition to County regulations, State and regional regulations must also be followed.

Ascent proposes in depth documentation of existing water resources, including addressing the impaired watersheds in the County, to determine if adequate water is available for cannabis cultivation for the various geographic areas. In addition to County data, it will include data from state-wide cannabis cultivation demands (pp. 23-24).

Rincon's proposal is much less detailed. There is no mention of analysis of availability and use by geographic area, or analysis of cannabis water usage by any other source than the County (p. 28).

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3. WILDFIRE RISK

Increased risk of wildfires and requirements to enable safe access by firefighting apparatus concurrent with evacuation of civilians are areas of great importance to Sonoma County. Both County requirements and state regulations must be followed.

Ascent proposes technical analysis of whether cannabis uses would create new or increased wildfire risk, whether road access would support concurrent fire apparatus ingress and civilian evacuation, emergency response times, and availability of water for firefighting. Recognizing its expertise in analyzing wildfire safety aspects, the State Board of Forestry hired Ascent to prepare an EIR if such was needed when the state revised its fire safe regulations (ultimately since the state kept the existing regulations, no EIR was prepared).

Rincon, by contrast, already assumes that cannabis operations would be allowed in high/very high fire risk areas, and thus just would look at risk mitigation measures. No mention is made of where cannabis operations could be safely located, evacuation issues, emergency response times, road access or water availability.

4. PROPOSED HOURS AND COST

In evaluating the proposals, one must look at what is encompassed in the labor costs and work to be performed, not just the total cost. It is concerning that the one company who has never done this specific type of project has submitted a bid with half the hours of the other company who has actually done this type of project multiple times.

Rincon

Rincon proposes 1259 labor hours at **\$196/hr** (total labor cost \$246,822). This includes up to 24 meetings with the County.

\$209,336 Direct Costs, which includes \$206,816 in consultant/subconsultant costs. \$162,150 of the subcontractor costs are for Economic Analysis.

Total budget \$456,158

Ascent

Ascent proposes 2525 labor hours at **\$176/hr** (total labor cost \$441,510). This includes up to 36 meetings with the County.

\$181,728 Direct Costs which includes \$174,678 subconsultants.

Note that both Ascent and Rincon propose the same subcontractor for Economic Study, yet Ascent proposes \$132,000 for the subcontract vs Rincon's \$162,150.

Total budget \$623,238

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Comparison between Proposals - Hours and Costs:

RFP Consultant Cost Comparison for Sonoma County Cannabis EIR											
	Rincon				Ascent				Difference- Ascent over Rincon		
	Hours	Labor Budget	Subcontractor Expenses	Total Expense	Hours	Labor Budget	Subcontractor Expenses	Total Expense	Hours	Expense	
Expenses Total Budget											
Task 1: Project Management	114	\$ 24,526		\$ 24,526	156	\$ 32,880		\$ 32,880	42	\$ 8,354	
Task 2: Environmental Impact Report	1145	\$ 222,296	\$ 44,666	\$ 266,962	2345	\$ 403,350	\$ 31,350	\$ 434,700	1200	\$ 167,738	
2.1 Environmental Review Scoping	37	\$ 6,552		\$ 6,552	52	\$ 9,300		\$ 9,300	15	\$ 2,748	
2.2 Data Collection	15	\$ 2,948		\$ 2,948	62	\$ 11,710		\$ 11,710	47	\$ 8,762	
2.3 Technical Studies	Note 1	138	\$ 27,764	\$ 44,666	464	\$ 79,700	\$ 31,350	\$ 111,050	326	\$ 38,620	
2.4 Administrative Draft EIR		575	\$ 103,264	\$ 103,264	1175	\$ 196,340		\$ 196,340	600	\$ 93,076	
2.5: Draft EIR		188	\$ 43,714	\$ 43,714	108	\$ 18,740		\$ 18,740	-80	\$ (24,974)	
2.6 Final EIR		170	\$ 32,868	\$ 32,868	332	\$ 57,320		\$ 57,320	162	\$ 24,452	
2.7 Review and Adoption		22	\$ 5,186	\$ 5,186	152	\$ 30,240		\$ 30,240	130	\$ 25,054	
Task 3 Economic Study	Note 2		\$ 162,150	\$ 162,150	24	\$ 5,280	\$ 132,000	\$ 137,280	24	\$ (24,870)	
Reimbursable Expense			\$ 2,520	\$ 2,520			\$ 18,378	\$ 18,378	0	\$ 15,858	
Project Total		1259	\$ 246,822	\$ 209,336	\$ 456,158	2525	\$ 441,510	\$ 181,728	\$ 623,238	1266	\$ 167,080
Avg Hourly rate			\$ 196			\$ 175					
Notes:											
Note 1: Subcontracted costs are for Traffic Impact Analysis. 2 different vendors											
Note 2: "Economic Study" subcontracted out to EPS on both bids. Interesting different amounts!											
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Thank you for considering our comments.

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Nancy and Brantly Richardson, Communications Directors
SonomaNeighborhoodCoalition@gmail.com

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