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Subject: EIR comments

To Whom It May Concern:

I am concerned that the EIR for Cannabis Regulation in Santa Cruz County is insufficient and lacks appropriate mitigation measures to avoid and minimize environmental impacts to our county's biodiversity. The methods for determining the details of this large-scale land-use change seem to be based on the results of a single, inadequate survey.

The proposed Program significantly changes allowed use within 147,750 (or 164,721) acres of Santa Cruz County, but the DEIR authors have limited the analysis of impacts to a tiny fraction of that area (190.1 acres) based on unreliable, self-reported data from a single survey including a small subset of potential cannabis cultivators. Instead of setting forth major zoning or geographical measures for avoiding many impacts, the central approach of CEQA, the DEIR supposes, without justification, that there will be little impact, while the proposed Program allows for a much greater level of impact. As such, this programmatic environmental review is inadequate in analyzing, avoiding, and addressing the potential impacts of the proposed Program.

Additionally, significant risks may be posed by the use of rodenticides in cannabis cultivation.

What will be the impact of rodenticides on wildlife and how can rodenticides be successfully controlled so as not to harm non-target animals? To what extent are special status species affected by current levels of poisonings with rodenticides and pesticides? Given the current baseline use of legal and illegal rodenticides, how will rodenticide use change with the various identified alternatives (the current project, permissive version, and "no project")?

Thank you,  
Alex Jones  
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