



DEPARTMENT OF PARKS AND RECREATION
Santa Cruz District
303 Big Trees Park Road
Felton, CA 95018

Lisa Ann L. Mangat, Director

October 31, 2017

Matt Johnston
Planning Department
701 Ocean Street, 4th floor
Santa Cruz, CA 95060

Subject: Commercial Cannabis Regulation Draft EIR -- Revised Comments

The Santa Cruz District of the California Department of Parks and Recreation (State Parks) appreciates the opportunity to review the Draft EIR for the Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program.


As a land manager with property subject to the impacts of illegal cannabis cultivation, we support the program objective to minimize unlicensed and illegal cultivation and manufacturing activities. We also support regulations to minimize the impacts of licensed cultivation and manufacturing on natural and cultural resources, and to ensure compatibility with surrounding land use.

We have the following specific comments on the Draft EIR:

- Figures 2.5 and 2.6 erroneously include State Park property within the Proposed Area of Eligibility for Cultivation. Portions of Big Basin Redwoods State Park, Castle Rock State Park, and Henry Cowell Redwoods State Park, and the entirety of The Forest of Nisene Marks are shown within areas for either indoor or outdoor cultivation. Please revise these figures to exclude all State Park property from any Proposed Area of Eligibility for Cultivation.
- To reduce potential impacts of licensed cultivators and manufacturers on the resources and operations of State Parks, we request that the County consider a larger setback from State Park property. At a minimum, we request a 600 foot setback from State Parks outside of urban limits, as included in the Project Alternative, rather than the 300 foot setback recommended in the More Permissive Project Alternative.
- To reduce the impacts of unlicensed cannabis cultivation, State Parks strongly supports the Sustained Enforcement Program included in Mitigation Measure AT-1.3a. It is imperative that County fund and implement a program to enforce the restrictions on licensed activities and reduce the continued impacts from unlicensed operations.

If you have any questions regarding this comments, please contact Joanne Kerbavaz at (831) 335-6395.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Spohrer". The signature is fluid and cursive, with a large initial "C" and "S".

Chris Spohrer
District Superintendent