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 Subject: Comments to EIR

As a Taxpayer in Santa Cruz County

All commercial cannabis growers in the County should be required to pay taxes. However, it is likely that many growers will continue to operate without permits even in the lowest regulation environment to avoid paying taxes, and the cost of complying with County fire, health and safety regulations. The EIR draft specifically states the County will have a hands-off policy regarding unlicensed operations. Nowhere does the ordinance create a clear mechanism to insure all growers register and pay their taxes, unlike any other industry. Without enforcement, many growers will continue to operate illegally and the County will lose millions of dollars in taxes from their illegal operations.

The County collects substantial monies from cannabis taxes currently, and those revenues will increase exponentially as the commercial cannabis industry grows. The County should designate a percentage of cannabis tax revenues to fund regular inspections and enforcement of cannabis rules in the same way that it enforces regulations on other agricultural businesses. Enforcement is the only way the Country will get the majority of commercial growers to become legal, pay taxes, and to come under health, safety and environmental rules.

No Reliance on Citizen Complaints

The proposed ordinance currently relies on citizens to make complaints about unlicensed growers, and (first hand) observed fire, health and safety issues. Given the large dollars generated by cannabis cultivation, citizens are fearful of being harassed by illegal growers if they make complaints even if the stated County policy is to keep the complainant's information private. Citizens are not the first line of compliance in any other agricultural business in the County, the County must have an enforcement mechanism which does not rely upon its citizens. The County currently regulates all other commercial agricultural businesses, and has appropriate fines, penalties and processes to insure those businesses comply with County regulations especially in regards to health, safety and environment. Violators should have their businesses shut down. Commercial cannabis cultivation should not be the exception. The County must create reasonable but robust enforcement which does not rely on citizen's complaints as the primary or only method to find illegal operations, levy fines, confiscate illegally grown cannabis, and to force those illegal growers to comply if they want to continue in operations.

As a Resident in a Rural/Residential Forest Area

The history of cannabis cultivation goes back many decades, and in the past growers chose remote locations to set up operations before cannabis cultivation became legal, and no surprise growers still favor areas with minimal or no law enforcement presence. Often these locations are in forested and mountainous areas which are residential in nature. I am a resident in one such area on a private one-lane blacktop road with the Forest of the Nasene Marks to the Northeast and the Cal Policy forest to the South. Dozens of cannabis operations are operating on my road causing:

creased risk of fire according to Cal Fire especially from unregulated electrical wiring

anufacturing using chemicals to make hash oil type products including butane

Over-use of very limited water resources

Over-use of the one-lane private road by large trucks, and substantial car traffic from trimmers who do not live in the area in the fall harvest. Increased traffic create car accidents. Excess traffic overtaxes the private road association's road maintenance budgets.

Noxious smells during the fall

Substantial degradation and change of rural residential land use to commercial cannabis growing

Issues Not Properly Addressed in the EIR

While zoning in rural/residential forested areas may allow dozens or hundreds of commercial growing operations in many neighborhoods, the County does not address how to prevent the radical transformation of a residential community into high scale commercial cannabis farming. The County should limit the number of cannabis operations in heavily forested and mountainous terrain to preserve the character of remote rural/residential areas.

- All use of chemicals in manufacturing should not be allowed in rural/residential areas. Chemical production should be done in commercial and industrial areas where it can be done safely.

Conclusion

The County must develop strategies to situate cannabis cultivation into the many existing agricultural areas and discourage cultivation in rural/residential forests.