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 Subject: Sierra Club Comments on Cannabis Cultivation Ordinance Final DEIR
 Attachments: Sierra Club Cannabis Cultivation Ordinance Comments 103117.pdf

Dear Santa Cruz County Board of Supervisors,

The Sierra Club of Santa Cruz finds the Draft Environmental Impact Report (DEIR) deficient in meeting the requirements of California Environmental Quality Act for protecting our dwindling habitat, sensitive wildlife and unique natural communities. We urge you to not approve it. This DEIR does not address major concerns of enforcement, water limits, toxic chemical use as well as problems of new development, increasing traffic and poor air quality that occurs with the commercial cannabis cultivation and manufacturing industry.

Invest in an Enforcement Team

First, several significant environmental impacts have no real enforcement. Without oversight and enforcement of regulations the impacts will be much more significant than reported in this DEIR. Enforcement is essential to protect our local land, soil, air and water, it is impossible for the "County Agriculture Commission and a County Licensing Official to ensure compliance" for such a large and expanding cannabis industry. The County Sheriff Department estimates there to be approximately 1,800 grow sites presently. How will only one or two inspectors be able to monitor the increasing number of commercial grow sites?

The money generated by this new industry must be dedicated to hire a team of inspectors checking sites regularly to make sure the growers are educated about the importance of ecological regulations and to verify growers are actually and strictly following them.

Include Water Resources

Secondly, this DEIR does not even include a section on Water Resources and the impact this cannabis industry will have on our very limited, local water supply. With population growth and climate disruption in the form of years of re-occurring drought, our county water supply is constantly under stress. It is astounding that our limited water resources are not addressed when this industry will demand thousands of gallons of water from our already depleted aquifers. Where will this water come from?

Section 3.9 merely mentions the adverse affects of altering courses of streams and it does not list serious mitigation for siphoning water out of our creeks and streams. We fear that our very endangered Steel head fish, which use to fill our local streams, will be pushed into extinction. Again we wonder about the feasibility of enforcement with protecting healthy creeks, the river and other natural resources with these new DEIR water regulations. Water is central to a thriving ecosystem and must be monitored carefully, this would again require the staff to monitor and assure that creeks are not being depleted.

Encourage Alternatives to Toxic Chemicals

The DEIR needs to outline more regulation and enforcement of rodenticides, herbicides and pesticides. These chemicals wreak so much havoc on the environment; they poison and kill life, negatively impacting our climate by contributing to climate changing greenhouse gases, destroying water quality and contaminating our soil, often permanently. Run-off and pollution from these chemicals should be seriously controlled. Thus the DEIR needs to include testing and incentives for growing without toxic chemicals to encourage organic growing. Once again this means having people power to monitor these polluting practices.

Limit New Development to Preserve Habitat

We are concerned that the DEIR does not address the impact of inducing new development in our small mountain neighborhoods and wild lands. By requiring 20 foot wide access road and housing on each grow site, this DEIR is inviting environmental destruction of habitat for wildlife and loss of open space for humans. Many people live and visit here because of the wildlife, the natural beauty, open spaces and quiet quality of life which will be altered forever by more construction.

Erosion, sediment in creeks and landslides will increase when we riddle the area with wide and tall roads. Creating 20 foot

wide roads often necessitates a cut into mountain sides of 12 feet high or more. Last winter, the winter of 2017, we experienced many terrible examples of ground failure and erosion as county roads and entire mountain sides were washed away. Plans for avoiding the creation of these road hazards should be included in a DEIR.

Reduce Traffic and Lessen Air Quality Impacts

With development and road access comes more traffic and consequent air quality problems; these impacts are significant and unavoidable or unmitigatable. There must be limits placed on the number of roads and housing constructed in our county with the expansion of the cannabis industry. Undeveloped open space not only preserves shrinking animal habitat but preserves Santa Cruz County's treasures of spacious, quiet neighborhoods and cleaner air. We want this industry to be regulated so we may maintain our high quality of living close to nature.

Thank you for responding to our comments.

Sincerely,

Greg McPheeters

Chair, Santa Cruz Group, Sierra Club