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Subject: Cannabis EIR comments

Attachments: eir letter.docx

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October 30, 2017

Cannabis Comments c/o Matt Johnston  
Planning Department  
701 Ocean Street, 5th Floor  
Santa Cruz, CA 95060

SUBJECT: Environmental Impact Report Comments for the Cannabis Cultivation and Manufacturing Program

I am a thirty year resident of the county area of Lompico where I reside with my 9 year old son. I hold a BA in Environmental Studies, and MA in Education and work in Environmental Outreach for a local municipality.

I am very concerned about permitting cannabis growing and manufacturing in the residential mountain neighborhoods of Santa Cruz County. I have reviewed the draft EIR and found some of the recommendations and findings in it to be highly inaccurate. The EIR should be rejected and sent back to be corrected to reflect the real environmental effects of actual cannabis agriculture.

**1. Water Use.** I have a private water system for my household use. I am very concerned about a marijuana farm on any property upstream from me that could dewater the creek where I draw my water. I found a discussion of water use in chapter 3 where it explains why you are using 0.03 gallons of water per square foot of canopy per day to grow a marijuana plant outdoors. This is completely underrepresented. This assumption of water use is so out of scale with reality that all the conclusions and recommendations made in this EIR about water use are inaccurate and the EIR deficient by the standards of the law. Reports indicate that 50 marijuana plants require 26,000 gallons per season, on average. Just imagine fifty times this amount of water being used in some county areas for cultivation. Local waterways, the private aquifer wells and local water districts cannot handle this type of water demand. Our local water districts are currently some of the most strapped in the state since all water in SC County is from local surface and groundwater sources only; with no access to water sources outside of the county. I work for a local water district and know for a fact that every local water district in this county has extremely limited amounts of water. I have also talked to numerous well owners whose wells dried up during the drought even without marijuana cultivation as a factor. One neighbor who pulls 26,000 gallons of water a year will directly affect the water availability of all others pulling from that same area. What recourse will be available to these residents? Permitting cultivation without sufficient water availability and study will significantly increase the liability of Santa Cruz County.

**2. Tree Cutting, Erosion & Increased Sediment.** The discussion of tree cutting on a large scale is absent from the EIR, and would be of serious environmental concern. I live in a neighborhood zoned almost exclusively as RA, so under the County's proposed plan, someone could grow marijuana there. I know that one could walk down to planning and get a land-clearing permit to completely strip my 2 ½ acre parcel. I couldn't find any discussion in the EIR of the impact of tree cutting in our forests.

There was an illegal pot grow in this area last year that included several acres of redwood forest removal. After receiving 98 inches of rain, a mudslide came down from the cleared grow site; it completely covered Lompico Road and sent one ton of sediment into Lompico Creek. The County had to come up and remove the mudslide over the road as it became impassable for 30 homes. This mudslide caused by tree cutting for cultivation purposes was also partially responsible for the 65% road wash out past 11490 Lompico Road that the county is also still responsible for repairing. The amount of extra erosion and sediment into the Lompico Creek is still clearly visible today; and no doubt will be worsened this year since it has not been repaired. Who will cover the costs of damage due to logging tied to marijuana cultivation?

Increased sediment from cleared grow sites is of course a detriment to the threatened steelhead trout. This is not reported for in this EIR and needs to be.

**3. Residential Agriculture zones** are fundamentally residential zoning, not agriculture. My neighborhood, which is zoned almost exclusively RA, is a forested redwood canyon, and is in no way agricultural. Our Lompico "RA" neighborhoods qualify as "low" or "very low" urban residential density with 1.0 – 7.0 units per acre according to a study conducted in 2017. To grow an agricultural crop in my neighborhood and many others like it, a marijuana farmer would have to cut a huge patch of redwood trees to get

enough sun to grow a crop large enough to make it worth it. Marijuana growing should not be allowed in RA zones. They are residential. This is unfit for agricultural purpose.

4. **Code Enforcement.** The County acknowledges that it has no ability or reasonable intent to enforce the existing or proposed ordinances. It actually says this in the last paragraph of the proposed ordinance itself, and also throughout the EIR. Yet you create an EIR where all the supposed mitigations are based upon compliance with rules and regulations. So the mitigations will be ineffective if the county follows their practice of very weak or actual non-enforcement.

There are several illegal grows in this area that the county refuses to look in on after repeated calls. This has already led to incredible environmental degradation without any recourse whatsoever on the part of the grower and significant increased maintenance costs and liability to the County of Santa Cruz. We have witnessed several creek pumps going nonstop with illegal creek water use, illegally dammed creeks that burst during the storms and caused mudslides, non-point erosion due to tree cutting, dumping of fertilizers and pesticides, and the ongoing cumulative effects of this environmental degradation.

5. **Pounds of Marijuana.** I read in the EIR that up to 26 million pounds of marijuana could be produced under the most permissive project which Planning Dept staff is recommending. This is unbelievably huge. I couldn't find anywhere in the EIR where it talked about how much is now being grown or produced, but I'll bet is it a tiny fraction of that. Maybe 1 % or less. I see that the county set a goal to "Encourage the commercial cultivation and manufacturing of high quality local cannabis products that meet the demand for Santa Cruz cannabis and cannabis products, including the needs of medical patients and their caregivers, as well as adult personal use as authorized under Proposition 64". This is a joke if you are planning on allowing many times (maybe 100 times) more growth than what is needed to meet the local demand. Exporting a product like marijuana in the Santa Cruz mountains, with all of its associated risks and environmental problems, is very different than growing apples, strawberries or roses on controlled agricultural land. I do not believe the EIR accurately states the environmental impact of growing many, many times the volume of marijuana than is currently grown.

The EIR needs to be re-written to reflect all the real environmental costs of cannabis cultivation. The County should also re-evaluate the costs that will burden the County and local residents.

Sincerely,

Tamara Stolzenhaller, MA