

10/26/2017

Santa Cruz County Board of Supervisors
And Ms. Robin Bolster-Grant, Cannabis Licensing Manager
Department of Cannabis Licensing
701 Ocean Avenue, Room 520
Santa Cruz, CA 95060

Subject: EIR Comments regarding (1) non-publication of cannabis site addresses; and (2) increased cultivator square footage to 10% for small 1-10 acre parcels.

To Regulators and Supervisors:

In response to the EIR, I am writing to comment on two cannabis regulation issues relating to personal safety, crime, and small business economics. Specifically, I am concerned that (1) publication of cannabis site addresses will put small grower or manufacturer lives and products at risk; and (2) small growers (1 to 10 acres) and small manufacturers will not be able to survive economically.

1. Proposed cannabis regulations put small grower and manufacturer lives and products at risk due to crime. Please do not disclose cannabis grow or cannabis manufacturing locations to the public. If you publish cannabis production locations, you are advertising "**gun-free zones with high street-value cannabis products where any criminal can easily steal \$20,000 to \$50,000 or more in cannabis products or cash with a gun or superior force**". By regulations and government publication of cannabis cultivation and manufacturing sites to the public, criminals will know both the locations that have cannabis and that smaller cannabis production site operators will not have guns on site to defend themselves. This situation will likely lead to numerous robberies, particularly at smaller licensed cannabis sites. It will also needlessly put hundreds or thousands of lives at risk due to violent crime potential. One can easily imagine cannabis site operators, employees, families, site suppliers, and other site visitors being hurt, injured, or killed during such robberies or robbery attempts.

Larger cannabis growers, manufacturers, and distributors will have the capital resources to pay for expensive security systems, armed guards on site 24-7, and other effective self-protection schemes. Small growers and manufacturers will not be able to afford armed guards on-site 24-7 because they will not have sufficient site-based revenues to pay for such security. This security risk is extremely dangerous for small cannabis site operators (and their families) who would live on-site, and puts many other lives (employees, suppliers, visitors, regulators) at risk unnecessarily.

In addition, a side effect will be to decrease cannabis site property resale values for sales for subsequent non-cannabis uses. Because of prior cannabis site address publication, subsequent non-cannabis use buyers or tenants of former cannabis cultivation or manufacturing sites would be subject to the same security risks as prior cannabis site operators. This risk would very likely lower property values for former cannabis cultivation and manufacturing sites.

The main parties who have a “need to know” grower and manufacturer locations are cannabis licensing and regulatory agency officials, and law enforcement in the immediate jurisdiction. Insurance companies insuring the site will also need to know. However, insurers will have insurance policy exclusions to protect them against claims if they do not.

If the County insists on publishing licensed cannabis site locations, then the County should be obligated to provide low cost cultivator and manufacturer (1) electronic video security and alarm systems with remote online 24-7 video monitoring by trained security systems staff; together with (2) effective, very fast licensed security guard and armed law enforcement response times (5 minutes or less).

2. Small cannabis grower (one to ten acres) and manufacturer economics require more permissive land use permitting. Small growers (one to ten acre parcels) need to be permitted to use up to 10% of their properly-zoned land for their cannabis business. Otherwise, small growers probably cannot hope to achieve business-survival level revenues.

Unless you want the licensed cannabis industry to be dominated by a few large companies, County and State ordinance parameters for smaller parcels must permit larger revenue generation. Otherwise, the predictable economic result will likely be the elimination of most small growers and manufacturers within 3 to 10 years due to government requirements.

Previously emphasized government (and citizen) goals have been reducing crime by reducing illicit cannabis industry size, encouraging small (boutique) cannabis industry participants and jobs, and increasing government tax revenues. The following will help accomplish all three.

- Keep cannabis grower and manufacturing site locations confidential for regulator and law enforcement use. Do not make this cannabis site address data available to the public.
- Increase the allowed grow square footage for licensed cultivators for small parcels under 10 acres to 10% of parcel size.
- Double small-manufacturer square footage permitted.

Thank you for your consideration.

A Concerned Citizen and Voter