

From: [J.R. <jr@lighthousebotanical.com>](mailto:J.R.<jr@lighthousebotanical.com>)  
To: [CannabisEIR <CannabisEIR@santacruzcounty.us>](mailto:CannabisEIR<CannabisEIR@santacruzcounty.us>)  
Date: 10/31/2017 5:16:18 PM  
Subject: Re: Comments Draft EIR

Dear Manager Bolster-Grant & Santa Cruz County Board of Supervisors:

I would like to issue a few comments on the Draft EIR for proposed regulations for commercial cannabis cultivation and manufacturing in Santa Cruz County.

As a second-generation master grower—my aunt was one of the pioneer cannabis cultivators in Humboldt County—and a resident of Santa Cruz County for most of my adult life, I have a unique perspective on the industry. Given that context, I have witnessed first-hand the environmental damage from many of the illegal grows in the mountains of Northern California; I am very pleased to see that you are addressing those concerns with this ordinance, while at the same time facilitating legal grows outside of environmentally sensitive areas in the area, primarily in areas zoned for agriculture.

1) As is already suggested by the findings in the EIR, I want to encourage in the strongest terms possible the County “aggregating” parcel-size calculations for ag properties so that grows are consolidated to one parcel for multiple-parcel businesses. Having surveyed a number of greenhouses in Santa Cruz County, it seems that it would make sense for aggregating licenses on commercially zoned agriculture parcels of 15 acres and larger, rather than 40 acres (of which there are only a handful). It would also make sense to allow agricultural enterprises with multiple parcels to calculate their acreage into a single figure and aggregate those grows on a single site. This will cause the least amount of environmental impact, facilitate greater security and fire protection, and diminish community impacts.

2) I didn't see how you are addressing nursery grows in the EIR? Perhaps I missed this. This is the preparation of small plants for larger grows. Monterey County defined "nursery" as meaning a site that “produces only clones, immature plants, seeds, and other agricultural products used specifically for the planting, propagation, and cultivation of cannabis.” Monterey taxes this activity at a significantly lesser rate ([1/10<sup>th</sup>](#)) than that general of cannabis grows. I would again suggest 10 percent nursery activities in greenhouse facilities of parcels of 15 acres or more.

3) I have spent a large part of my life's work focusing on so-called “industrial hemp,” or non-psychoactive strains of cannabis, which is used solely for medicinal purposes. I would hope that you would consider “industrial hemp” grows in up to 20 percent of available greenhouse space on commercially zoned agriculture sites of 15 acres or larger.

4) I think you should define “canopy” as “meaning the net vegetative grow area of the *flowering portions* of a plant.” The canopy should be calculated by the flowering portion of a plant, not by its broader leaves.

5) Finally, and very significantly, I would like to see the County support organic cannabis grows. I have long opposed indoor grows and rogue mountain grows because of their use of pesticides and other chemicals and because of their environmental damage. There is an organization that presently certifies organic grows called Clean Green Certified. I would hope that the County would grant up to 50 percent larger grows on agriculturally zoned parcels that are so certified.

Thank you for your consideration.

Most sincerely,

J.R.Richardson  
Lighthouse Botanicals Coop

