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 Date: 10/30/2017 10:24:52 PM  
 Subject: Cannabis EIR Comments

Greetings,

- 1: Is any other county in California applying the F-1 Factory Industrial Fire Code to greenhouse cannabis cultivation? Which counties?
- 2: Is any other county in California applying F-1 Factory Industrial Fire Code to drying, trimming, or non-volatile cannabis manufacturing?
- 3: Is any other county in California requiring 20 foot fire roads for greenhouse cannabis cultivation?
- 4: Is any other county in California requiring 20 foot fire roads for drying, trimming, or non-volatile manufacturing of cannabis?
- 5: Is F-1 Factory Industrial fire code applied to any other agricultural cultivation of any other plant in Santa Cruz County?
- 6: Is F-1 Factory Industrial fire code applied to the processing and manufacturing of any other agricultural product in Santa Cruz County?
- 7: Is live growing cannabis plant more likely to cause a fire than a tomato plant? Do living cannabis plants spontaneously combust?
- 8: If someone wanted to build a greenhouse in SU, RA, or TP zoned parcels in order to grow tomatoes in that greenhouse, and they needed to have electricity in that greenhouse to grow tomatoes, would F-1 Factory Industrial fire code be applied?
- 9: Are there any existing greenhouses in Santa Cruz County that were required to have 20 foot roads and 120,000 gallons of water storage? Please document these parcels as examples of existing Santa Cruz greenhouses where F-1 fire code has been applied and required.
- 10: All greenhouses in Santa Cruz County typically fall under the Group U Miscellaneous fire code. Why was there no analysis in the EIR for greenhouses and agricultural buildings with the GROUP U fire code applied? GROUP U is clearly stated in the California Fire code as the typical classification for greenhouses and agricultural buildings.
- 11: The actual F-1 Factory Industrial Fire Code from the California Fire Code was never clearly stated in the EIR, and this seems to be a problem. When one reads the actual F-1 Factory Industrial Occupancy code, it is clearly not intended for agricultural cultivation. For the record, here is the actual CALIFORNIA FIRE F-1 wording. It is clear that this does not apply to the actual growing of plants, and the mention of 'hemp products' is referring to use of hemp fibers, such as for making rope and textiles.

**Factory Industrial F-1 Moderate-hazard occupancy.**

Factory industrial uses that are not classified as Factory Industrial F-2 Low Hazard shall be classified as F-1 Moderate Hazard and shall include, but not be limited to, the following:

Aircraft (manufacturing, not to include repair)

Appliances

Athletic equipment

Automobiles and other motor vehicles

Bakeries

Beverages; over 16-percent alcohol content

Bicycles

Boats

Brooms or brushes

Business machines

Cameras and photo equipment

Canvas or similar fabric

Carpets and rugs (includes cleaning)

Clothing

Construction and agricultural machinery

Disinfectants

Dry cleaning and dyeing

Electric generation plants

Electronics

Engines (including rebuilding)

Food processing and commercial kitchens not associated with restaurants, cafeterias and similar

dining facilities more than 2,500 square feet (232 m<sup>2</sup>) in area.

Furniture  
Hemp products  
Jute products  
Laundries  
Leather products  
Machinery  
Metals  
Millwork (sash and door)  
*Motion picture and television production studio*  
*Sound Stages, Approved Production Facilities*  
*and production locations (without live audiences)*  
Musical instruments  
Optical goods  
Paper mills or products  
Photographic film  
Plastic products  
Printing or publishing  
Recreational vehicles  
Refuse incineration  
Shoes

12: Please correct the wording in the EIR on page 3-12:

**“F-1 - Factory Industrial Group** occupancy includes the use of a structure, or a portion thereof, for moderate hazard uses, including assembling, disassembling, fabricating, finishing, manufacturing, packaging, repair or processing operations, including hemp products, tobacco, and food processing establishments/commercial kitchens under 2,500 sf that are outside of restaurants or dining facilities. “

This needs to be CORRECTED to read that F-1 applies to commercial kitchens OVER 2,500 sf. It appears that someone completely misquoted the California Fire Code for F-1, and incorrectly slipped into the EIR that F-1 applied to commercial kitchens UNDER 2,500 sf. In fact, the Cal Fire Code states the exact OPPOSITE. Cal Fire F-1 Group clearly states that F-1 only applies to commercial kitchens that are OVER 2,500 square feet. So to be clear, F-1 Group should NOT apply to small commercial kitchens that are UNDER 2,500 sf. So commercial kitchens under 2,500 should not have F-1 Factory Industrial Group applied. (thus not requiring 20 foot roads and 120,000 gallons of water storage). This needs to be corrected!

13: GROUP U MISCELLANEOUS was not analyzed in the EIR whatsoever for greenhouses and agricultural buildings, when this description seems a lot more appropriate for cannabis cultivation, drying, and trimming. From the 2016 California Fire Code:

**Miscellaneous Group U.** Buildings and structures of an accessory character and miscellaneous structures not classified in any specific occupancy shall be constructed, equipped and maintained to conform to the requirements of this code commensurate with the fire and life hazard incidental to their occupancy. Group U shall include, but not be limited to, the following:

**Agricultural buildings**

Aircraft hangar, accessory to a one- or two-family residence (see Section 412.5 of the *California Building Code*)

Barns  
Carports  
Fences more than 6 feet (1829 mm) high  
Grain silos, accessory to a residential occupancy

**Greenhouses**

Livestock shelters  
Private garages  
Retaining walls  
Sheds  
Stables  
Tanks  
Towers

California Fire Code clearly groups greenhouses and agricultural buildings in the Miscellaneous GROUP U category. Why was Group U not analyzed in the EIR? And it appears that GROUP U would not require 20 foot fire roads or 120,000 gallons of water storage. So why was GROUP U not analyzed in the EIR?

14: In the EIR Appendix D, why is the ‘FIRE CHIEFS ASSOCIATION OF SANTA CRUZ COUNTY’, why is their recommendation dated August 15, 2017?? Isn’t that date AFTER the Administration draft of the EIR was released to County staff for review? Why was the FIRE CHIEFS ASSOCIATION recommendation for GUIDELINE TO FIRE CODE REQUIREMENTS FOR CANNABIS, why was it written AFTER

the administrative draft of the EIR was already available to County staff?

And why is there no human name associated with this document??

As this document seems to be the justification for applying F-1 Factory Industrial Fire Code to cannabis cultivation in the EIR, why is there no name, person, or title for who authored this document and made these recommendations for the County? Who is the actual person who wrote the FIRE CHIEFS ASSOCIATION document GUIDELINE TO FIRE CODE REQUIREMENTS FOR CANNABIS – the document that the entire EIR recommended fire code is based on? Why is there no person associated with this document?

15: This is the SANTA CRUZ COUNTY FIRE CODE – ROAD WIDTHS – \*Note the Exceptions for Local Responsibility Area (LRA)

#### SANTA CRUZ COUNTY FIRE CODE – ROAD WIDTHS

**7.92.202-ALL WEATHER SURFACE.** *An all-weather surface shall be a minimum of 6" of compacted Class II base rock for grades up to and including 5%, oil and screened for grades up to and including 15%, and asphaltic concrete for grades exceeding 15%. No grade shall be allowed to exceed 16% in State Responsibility Area (SRA) or 20% in Local Responsibility Area (LRA).*

**7.92.503.2.1– Dimensions.** *Fire Apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 15 feet (4572 mm).*

#### **Exceptions:**

1. *Within the State Responsibility Area (SRA) of Santa Cruz County, all driveways serving two or fewer habitable structures shall have an unobstructed width of not less than 12 feet (3658 mm) and an unobstructed vertical clearance of not less than 15 feet (4572 mm).*
2. **Within the Local Responsibility Area (LRA) of Santa Cruz County, access roads shall be a minimum of 18 feet (5486 mm) wide for all access roads or driveways serving more than two habitable structures, and 12 feet (3658 mm) for an access road or driveway serving two or fewer habitable structures. Where it is environmentally inadvisable to meet these criteria (due to excessive grading, tree removal or other environmental impacts), a 12-foot wide all-weather surface access road with 12-foot wide by 35-foot long turnouts located approximately every 500 feet may be provided with the approval of the fire code official.**
3. *Vertical clearance may be reduced; provided such reduction does not impair access by fire apparatus and approved signs are installed and maintained indicating the established vertical clearance when approved by the fire code official.*

So if GROUP U MISCELLANEOUS California Fire Code was applied to Greenhouses and Agricultural Buildings (as is the case with all other greenhouses and agricultural buildings in Santa Cruz not associated with cannabis), then only a 12 foot wide road would be required with 35 foot long turnouts every 500 feet in the Local Responsibility Area. Correct?

16: Is it true that the Board of Supervisors make the final decision on what fire code is applied to commercial cannabis operations? Is it correct that the road widths and water storage requirements are decided by the Board of Supervisors? Is it correct that the Board of Supervisors could elect to NOT apply the excessive F-1 Factory Industrial Fire Code to commercial cannabis operations?

If the County truly wants to embrace the findings of the EIR: **“Based on the information in this EIR, the Most Permissive Project Alternative is identified as the Environmentally Superior Alternative.”** Then the Board of Supervisors need to apply the GROUP U MISCELLANEOUS (NOT F-1 Factory Industrial) fire code to cannabis greenhouses, drying facilities, and commercial kitchens under 2,500 sf. No other agricultural product or process in Santa Cruz County requires 20 foot roads and 120,000 gallons of water storage. And legal and regulated cannabis operations are no more fire risk than any other agricultural business.

Regards,

Jeff Nordahl  
Santa Cruz County resident