

We can only support the **No Project Alternative** in the Commercial Cannabis Cultivation and Manufacturing Regulations and Licensing Program Draft EIR, for the following reasons:

- Neither the Commercial Cannabis Cultivation and Manufacturing Regulation and Licensing Program nor Alternatives 1 and 2 would meet the following Program Objectives:

Objective 2 Minimize unlicensed activities

There is no evidence that Program or Alternatives 1 and 2 would *decrease* unlicensed cannabis activities. Permitted cultivation and manufacture would be **in addition to** current and future unlicensed operations, **not instead of**. In other words, there will most certainly be more unlicensed operations, large and small.

Objective 5 Meet the demand for local cannabis products

The current demand for cannabis products *far exceeds local production capacity*. There will always be unlicensed cannabis cultivation and manufacturing to meet demand *with the lowest possible cost to producers*.

Objective 6 Increase County tax base

Because the total cannabis grows, both legal and illegal, will increase, the costs of management and enforcement of new cannabis regulations would exceed any increase in the county tax base.

Objective 10 Support public health and safety

There is no analysis in the EIR of public health and safety impacts of County promotion of increased production and consumption of cannabis and cannabis products.

- The County would be promoting the cultivation and manufacture of a mind-altering drug, with attendant liabilities for its impacts on public health and safety.
- The County Sheriff currently enforces existing environmental and cannabis cultivation laws on a complaint-driven basis. Adoption of legal cannabis cultivation and manufacture would **increase the enforcement responsibilities** of County Sheriff, **not reduce them**.
- Increased permitted cannabis cultivation would result in increased demands on already over-committed County water supplies, to the detriment of residents and wildlife habitat.

In summery, an across the board licensing of cannabis cultivation and manufacture for medical and recreational use is **not in the best interests of the residents** of Santa Cruz County. Cannabis is a mind-altering drug with well documented health and safety effects on users and the general public. Licensed cultivation and manufacture of cannabis products would increase already existing impacts of this new industry on the local environment.

Therefore, we can only support the **No Project Alternative**, accompanied by County policy of increased, proactive enforcement of existing laws and environmental regulations of cannabis cultivation and manufacture, and amendments to County Code for limited, **well-regulated production of cannabis products for medicinal purposes only**.

Michael A. Lewis
Jean Brocklebank
Live Oak Residents
Santa Cruz County, District 1