



October 15, 2017

Attn: Matt Johnston  
Planning Department  
Santa Cruz County  
701 Ocean Street, 4th floor  
Santa Cruz, CA 95060

Re: Cannabis EIR

My name is Vincent Lin, I am the president of Classico Design and Marketing. We have been in the agriculture sector for over 20 years. We grow different types of flowers and trees inside greenhouses, we are specialized in flowering cherry trees. Also, we are in the manufacturing business providing decorative fountains and statues for retailers.

Commercial farms are subject to extensive health and safety, environmental and worker protection regulations. The draft EIR does not recognize that all of these programs exist, and appears to pick and choose which should be applied to cannabis grows. Cannabis farmers should be subject to the same regulations as all other farmers, plus those unique to cannabis.

The EIR reviews the Project and More Permissive Project in detail. As to grows on CA zoned land the Project has a 2% parcel size limitation, increasing to 4% for the More Permissive Project. The Alternative Analysis considers three other possibilities; No Project, Most Restrictive, and Most Permissive. Each results in potential significant adverse impacts. Every EIR must consider reasonably feasible alternatives. "For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (Draft EIR, Alternative Analysis pg. 4-1)

CA Zoned Greenhouses Based on this criteria the environmentally superior alternative should be allowing co-location of multiple licensees, in order to maximize utilization of prime Ag land, on CA zoned land, with a preference for existing greenhouses.

Existing greenhouses, which the EIR points out as underutilized, avoid or mitigate every identified negative impact. Our workers will continue to be employed, not contributing to additional traffic congestion. There will be no new development so there is no impact to biological, cultural, geology and soils, and no increase in greenhouse gas emissions. Our greenhouse has an existing agricultural water well. This is the environmentally superior alternative.

There are a few changes which I believe would improve the proposed cannabis ordinance.

1. Rules Specific to License Types; CA Land (F)(1)(b) page 14: To maximize utilization of existing greenhouses on CA land and reduce the overall environmental impact of cannabis cultivation this should be changed to allow stacking of licensees and full occupancy of existing greenhouses as follows:

(F)(1)(b) Existing greenhouses may house multiple licensees. Individual licensees can grow up to 22,000 square feet in adjacent greenhouse space. Each existing greenhouse structure will have demarcations showing the area occupied by individual licensees. Greenhouse walls along the perimeter of the property must be opaque.

2. General Eligibility (G)(1)(a) page 16: Commercial farms, including greenhouses, are many times leased to other growers, even though the owner may have farmed or owned the property for decades. The limitation that the applicant is required to have engaged in commercial production for over 3 years is not necessary for existing greenhouses. It also limits the ability to stack licensees in one greenhouse.
3. Specific rules and exception for nurseries: California state law under MAUCRSA type 4 (Nursery license) do not have any restriction of square feet for growing non flowering cannabis plants. This applies only for nurseries. County Ordinance do not make this distinction. We believe the ordinance should be comparable the state law not more restrictive, specially with the 100 year tradition of nurseries we have in this valley.

The Pajaro Valley has a long tradition of nurseries growing flowers so we hope you take in account our suggestions so the Cannabis industry can flourish in both sides of the valley not only in the Monterey County side. Competition to the flower industry has been severe and as flower greenhouse growers we need other alternatives and diversification to our area so we can survive as business.

Thank you,



VINCENT LIN  
PRESIDENT

**CLASSICO DESIGN AND MARKETING, LLC.**



October 15, 2017

Attn: Matt Johnston  
Planning Department  
Santa Cruz County  
701 Ocean Street, 4th floor  
Santa Cruz, CA 95060

Re: Cannabis EIR

My name is Xavier Marques, I am the president of Nanofarms Inc. Nanofarms has been involved in the development of multiple olive tree plantings and nurseries in California over the last 20 years. We believe Santa Cruz county's weather will allow for a more sustainable, low cost production of medical cannabis products.

Commercial farms are subject to extensive health and safety, environmental and worker protection regulations. The draft EIR does not recognize that all of these programs exist, and appears to pick and choose which should be applied to cannabis grows. Cannabis farmers should be subject to the same regulations as all other farmers, plus those unique to cannabis.

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**2-General Eligibility (G)(1)(a) page 16:** Commercial farms, including greenhouses, are many times leased to other growers, even though the owner may have farmed or owned the property for decades. The limitation that the applicant is required to have engaged in commercial production for over 3 years is not necessary for existing greenhouses. It also limits the ability to stack licensees in one greenhouse.

**3- Rules specific and exception for nurseries (Type 4 license under MAUCRSA):** California state law under MAUCRSA type 4 (Nursery license) do not have any restriction of square feet for growing non flowering cannabis plants or in the vegetative stage. This applies only for nurseries. Santa Cruz County Ordinance do not make this distinction. We believe the ordinance should be comparable to the state law not more restrictive, especially with the 100 year tradition of nurseries we have in the Pajaro valley. Nurseries under CA zoning in greenhouses should be allowed to grow nursery stock of cannabis plants not having a square feet limitation.

The Pajaro Valley has a long tradition of nurseries growing flowers so we hope you take in account our suggestions so the Cannabis industry can flourish in both sides of the valley not only in the Monterey County side. Competition to the flower industry has been severe and as greenhouse growers we need other alternatives and diversification to our area so we can survive as business.

Thank you,



Xavier Marques  
PRESIDENT

**NANOFARMS INC.**



N.A. AGRO-INVESTMENTS, INC.

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Attn: Matt Johnston  
Planning Department  
Santa Cruz County  
701 Ocean Street, 4th floor  
Santa Cruz, CA 95060

Re: Cannabis EIR

My name is Xavier Marques, I am the president of North American Agro-Investments Inc. I am fifth generation grower. My family has been growing grapes and olives for multiple generations. North American Agro-Investments Inc. has several farms.

Commercial farms are subject to extensive health and safety, environmental and worker protection regulations. The draft EIR does not recognize that all of these programs exist, and appears to pick and choose which should be applied to cannabis grows. Cannabis farmers should be subject to the same regulations as all other farmers, plus those unique to cannabis.

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Thank you,



Xavier Marques  
PRESIDENT

**NORTH AMERICAN AGRO-INVESTMENTS INC.**