

From: ["David Rubin" <drubin@ucsc.edu>](mailto:drubin@ucsc.edu)

To: [CannabisEIR <CannabisEIR@santacruzcounty.us>](mailto:CannabisEIR@santacruzcounty.us)

Date: 10/30/2017 10:06:10 PM

Subject: Rural Bonny Doon Associaton board's comments on draft EIR

Attachments: DEIR comments rubin v2-1.docx

To whom it may concern:

Attached is a document with the comments of Board of the Rural Bonny Doon Association on the draft EIR.

Our concerns can be summarized as follows:

(1) The hypothesis that more lenient cannabis regulations will result in less environmental damage is unfounded. It contradicts Lt. Governor Newsom's report that concluded that Santa Cruz County's previous lax rules attracted growers from elsewhere.

(2) Assembly Bill 266 states that when cannabis interests conflict with protection of the public, protection of the public shall be paramount. The DEIR, however, lists many program objectives (section 2.3.1) that conflict with protection of the public. To be consistent with the AB-266, they should not be valued equally; protection of the public should prevail.

(3) Protection of the public should be achieved by rigorous enforcement of strict regulations rather than cockamamie speculation that more lenient regulations will offer better protection of neighborhoods and environments.

(4) Commercial cannabis belongs in Agricultural areas--not in residential mountain neighborhoods where the environment and wildlife sre more sensitive to damage from rodenticides, where threats of fire are greater, and where people have chosen to live away from commercial operations.

Sincerely,

Dave Rubin, RBDA Board vice chair