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October 30, 2017



Cannabis Comments c/o Matt Johnston  
Planning Department  
Santa Cruz County  
701 Ocean Street, 4th floor  
Santa Cruz, CA 95060

**Re: Cannabis EIR**

To whom it may concern:

For over 100 years the Santa Cruz County Farm Bureau has represented commercial farmers, ranchers, timber operators and rural land owners throughout the county. The pending legalization of cannabis in California has forced local and county governments to consider how to best regulate this new crop.

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

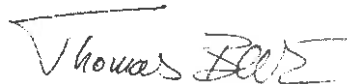
Existing greenhouses, which the EIR points out as underutilized, and CA zoned land in general, avoid or mitigate every identified negative impact. Our workers will continue to be employed, not contributing to additional traffic congestion. There will be no new development so there is no impact to biological,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

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TP Zoning: On the other end of the spectrum is random cultivation in TP zoned forest land. This is possibly the area where significant environmental consequences cannot be avoided or mitigated. Cannabis production on TPZ zoned lands has the realistic potential to reduce available timber harvest in Santa Cruz County. Cannabis production would likely preclude timber production on TPZ lands where cultivated on the same, or adjacent, parcels. The exponentially higher monetary return of cannabis over that of timber, coupled with the intense regulatory process centered around timber harvest that would likely deter the harvest of timber. This is contrary with the designated best and highest use of those lands, and would cause significant impacts to our local forest products industry. The limitations proposed by the Proposed Project alternative would cause fewer significant environmental consequences than the More Permissive proposals, however most of these would still be severe to significant, and without possible mitigation.

Thank you for considering our comments on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Thomas Broz". The signature is written in a cursive style with a horizontal line above the name.

Thomas Broz,  
President