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Subject: Draft EIR comments

The conservation and recovery of steelhead and coho salmon depends on watershed conditions and not just on stream and riparian habitats. ALL of the activities associated with cannabis cultivation - including water use, land clearing, residential development, road upgrades and construction, increase in impervious surfaces, run-off and more - have the potential to impact steelhead and coho salmon habitat conditions. The EIR needs to include a more thorough discussion of steelhead and coho salmon, potential impacts from cannabis cultivation and a better sense of how the ordinance can best minimize these impacts.

Cannabis cultivation could have very few or enormous impacts on watershed health and the associated listed and sensitive species that live in Santa Cruz County. The EIR needs to better discuss how the extent, density and geographic distribution affects expected cannabis cultivation impacts. For example, if only 2 roads in the San Lorenzo River watershed need to be widened to 20' to meet CalFIRE requirements, then they may not be a big deal; however, if 2 dozen roads in the San Lorenzo River Watershed need to be widened to 20', that's a big deal.

The section on rodenticides should include information that a frequent target of rodenticides, especially in the mountain region, is the dusky-footed woodrat, which is a species of special concern.

Since uniform fencing requirements have the potential to impact wildlife movement, the proposed flexible fencing plan for each property will be positive for wildlife and visual resources. I recommend that fencing decisions are documented so that the policy could be evaluated after several years of implementation.

Thanks for your consideration.

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